UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

FEB 2 9 2016

Mr. Joseph Ditty
Pretreatment Coordinator
The Municipal Authority of the City of New Kensington
120 Logans Ferry Road
New Kensington, Pennsylvania 15058

Re: Pretreatment Program – Field Audit Inspection
NPDES No. PA0027111

Dear Mr. Ditty:

On March 30-31, 2015, EPA conducted a Field Audit Inspection (FAI) of your pretreatment program. A copy of the FAI report is enclosed. The main finding of the audit is that the Authority does not properly or completely document all annual inspections. Also, the inspector noted some issues with Keystone Rustproofing, Inc. (Keystone).

POTWs are required to inspect all significant industrial users (SIUs) at least once a year pursuant to 40 CFR 403.8(f)(2)(v). The Authority does conduct annual SIU inspections, as required. However, it appears that such inspections are not properly or completely documented. The Authority conducted an annual inspection on December 16, 2014 at Keystone; it appears that the Keystone inspection report is incomplete (see *Attachment #14 of 16* in the FAI report). Inspections allow POTWs to obtain current data on SIUs and may reveal issues requiring action, which is information that may be needed for future use. The Authority should properly document all inspections to ensure that all pertinent information is recorded, especially in case there are issues that need to be addressed.

Also, the FAI report noted that there are ongoing violations at Keystone and that the overall general housekeeping at the facility is poor. EPA recommendations in regard to the ongoing violations will be discussed in the 2014 annual pretreatment report review letter. Note that poor housekeeping may be contributing to the ongoing violations at the facility. EPA recommends that the Authority include "good housekeeping" as a part of enforcement for the facility.

If you have any questions regarding this matter, please contact me at 215-814-5793.

Sincerely,

Jasmine Hennie

Jasmine Hennie
NPDES Permits and Enforcement (3WP41)
Water Protection Division

Enclosure

cc: Chris Kriley, PADEP Southwest Region (w/enclosure)
Ron Furlan, PADEP Central Office (w/out enclosure)

Field Audit Inspection

Summary

New Kensington Municipal Sanitary Authority

Waste Water Treatment Facility

120 Logans Ferry Road

New Kensington, PA 15068

PA0027411

The Field Audit Inspection at the New Kensington Municipal Sanitary Authority (the Facility) **(See Photo #1)** was conducted by the Office of Enforcement, Compliance and Environmental Justice (OECEJ) Region III, on March 30-31, 2015. Inspector, Jim Kline (Inspector Kline) presented his credentials to Mr. Curt Carion, Chief Operator as an authorized representative of the Agency. Mr. Carion introduced Inspector Kline to Mr. Joseph Ditty, Pretreatment Coordinator and Mr. Harry Cox Jr., Resident Project Representative-Hatch Mott MacDonald. Mr. Daniel Rowe Jr. is the Manager. Inspector Kline briefly explained the scope and time frame of the inspection to Mr. Carion.

Mr. Carion offered the following background information: The Facility was constructed in 1956 on an approximately 10-acre parcel and operates up to ten-million gallons per day (mgd). Currently, the output is six mgd. The Facility has undergone three major upgrades in the following areas: Secondary, Final Clarifiers and Chlorine Disinfection. Mr. Carion stated that the Facility does not accept hauled in wastes, which includes residual wastes from Oil and Gas activities. Generated sludge is hauled from the Facility and is disposed of in a landfill.

The Facility has seventeen employees (thirteen "Plant" and four administrative). Facility operations are staffed from 6:00AM until 2:00 PM on weekdays. The Facility has two employees for weekend coverage. Lab operations are staffed weekdays from 7:00 AM until 3:00 PM.

Inspector Kline was escorted to the Lab and was introduced to Mr. Keith Anderson, Lab Supervisor. The Lab has a total of four employees. The Lab employees collect and analyze in-house grab and composite samples taken at the Facility. Mr. Anderson maintains Standard Operating Procedures (SOPs) for each parameter that the Lab tests. SOPs were dated July or August 2006. Lab solutions and calibration standards appeared to be valid without reaching expiration. Photos of the pH buffer solutions were taken **(See Photos #2, #3 & #4)**. Mr. Anderson stated that equipment calibration is conducted by J. P. Technical Services **(See Photo #5)**. Each piece of Lab equipment did have a copy of the equipment Operator's Manual. A photo of the

Sartorius PP50 Meter was taken **(See Photo #6)**. A performance verification for the meter was conducted by JP technical on 2/26/2015. A copy of the results was provided **(See Attachment #1)**.

Inspector Kline requested to review documentation for Facility influent and effluent data. The Facility maintains data reports concerning this information. As a representative sample, a copy from 2/15/2015 shows recorded pertinent influent and effluent data **(See Attachment #2)**.

Mr. Carion provided a wastewater flow schematic **(See Attachment #3)** and escorted Inspector Kline on a tour of the Facility starting at the Pump House. Inside the Pump House, the following are located: Influent, Bar Screens and Wet Wells. An Eutek System is used for grit removal. Outside areas toured or observed were the: Head Cells, Primary and Decant Tanks, three (in-series) Digesters, Grease Trap, Bypass/Blending Channel, Aeration Basin, two Final Clarifiers, Belt Press (from the Digesters), Chlorine Contact Tank, Drying Beds and the Non-potable Building **(See Photo #7)** which houses the effluent composite sampler. The Facility uses a Hach Sigma SD900 for collection of samples **(See Photo #8)**. A thermometer was kept inside the refrigerated cabinet of the sampling device **(See Photo #9)**. The effluent appeared clear **(See Photo #10)**. There did not appear to be any visible issues at the receiving stream, the Pucketa Creek **(See Photo #11)**.

The Facility NPDES permit has an effective date of June 24, 2010, and was set to expire on June 30, 2015. A NPDES permit renewal application was sent to the Pennsylvania Department of Environmental Protection on December 19, 2014 (prior to the application deadline). The Facility has retained the services of Environmental Service Labs Inc. for the analytical testing of the Industrial Users (IUs). Mr. Joseph Ditty oversees the IU Pretreatment Program. Mr. Ditty stated the Facility has five IUs. A listing of the IUs, addresses and contact persons was provided along with analytical results for sampling events for 2014 **(See Attachment #4)**. The five IUs are: Castle Co-Packers, Alle-Kiski Medical Center (Citizens Ambulatory Care Center), Smithfield Farmland (Farmland Foods) Corporation, Keystone Rustproofing Inc., UniFirst Corporation and Schreiber Industrial Development Company. A June 9, 2014 letter from the Schreiber Industrial Development Company lists the tenants and the type of business operating in the Schreiber Industrial District **(See Attachment #5)**.

Inspector Kline reviewed the Pretreatment Annual Report for 2014 (dated March 2015) **(See Attachment #6)**. The report summarizes IU permit exceedances and actions taken by the Facility. A copy of the 2014 Pretreatment Fine Status Report lists two IUs (Keystone Rustproofing and Schreiber Industrial Development Company) as having been assessed penalties for permit exceedances **(See Attachment # 7)**. The Facility has sent Notices of Violations to Keystone Rustproofing (Keystone) dating back to December 2011 for permit exceedances. As a representative sample, Inspector Kline requested a copy of a Notice of Violation sent by the Facility to Keystone with an issuance date of January 21, 2015 **(See Attachment #8)**. The Facility provided a copy of all of the actual effluent parameter sample results since 2012, which were recorded on an Effluent Table **(See Attachment #9)**. The table shows exceedances for: cyanide, zinc, nickel, total metals and copper.

Inspector Kline reviewed IU Pretreatment Permits and requested a copy of the UniFirst Corporation as a representative sample **(See Attachment #10)**. Inspector Kline reviewed inspection reports conducted by Mr. Ditty at the UniFirst Corporation on 11/21/2013, **(See Attachment #11)** and on 12/8/2014 **(See Attachment #12)**. Both reports are seven-pages long. The 11/21/2013 inspection report appears to be complete with entries made in each section of the seven pages. The 12/8/2014 inspection report only has the general information recorded on page one, with the remaining six pages not being filled out. Mr. Ditty stated that he did not know why the remaining inspection report entries were blank. Inspector Kline reviewed inspection reports conducted by Mr. Ditty at Keystone on 11/22/2013, **(See Attachment #13)** and on 12/16/2014 **(See Attachment #14)**. The 11/21/2013 inspection report appears to be complete with entries made in each section of the seven pages. The 12/16/2014 inspection report only has six lines of the general information completed on page one, with the remaining four pages not being filled out. Mr. Ditty stated that he did not know why the remaining inspection report entries were blank. Inspector Kline requested a copy of a "Sample Report" for grab and composite samples that were collected at Keystone on 12/16-17/2014 **(See Attachment #15)**.

Inspector Kline selected Keystone Rustproofing, Inc. located at 1901 Dr. Thomas Boulevard Arnold, PA 15068 to continue with the field audit inspection. Inspector Kline and Mr. Ditty arrived at Keystone Rustproofing, Inc. **(See Photos #12 & #13)**.

Inspector Kline met Mr. Larry Vogel, Plant Manager and presented his credentials to him as an authorized representative of the Agency. Inspector Kline briefly explained the scope and time frame of the visit to Mr. Vogel.

Ms. Vogel provided the following background information about Keystone: The operations conducted here are primarily metal finishing and electroplating. Prior to Keystone's operations, the building was used as a glass factory. Keystone has fifty employees and has around the clock operations covered in three shifts. Mr. Vogel stated that operations sometimes do occur on Saturdays, but rarely on Sundays. Mr. Vogel stated that Keystone is a large quantity generator of hazardous wastes and is routinely inspected by the Pennsylvania Department of Environmental Protection. According to Mr. Vogel, Keystone is not required to have any air permits.

Inspector Kline requested and received a copy of the process-flow diagram along with a building layout for the Keystone operations **(See Attachment #16)**. Keystone has a continuous discharge of 25,000-gallons per day to the Facility. Mr. Vogel was aware of the IU permit exceedances and stated that Keystone had installed a new ultra-filtration unit from Veolia Services to correct the exceedances **(See Photo #14)**. According to Mr. Vogel, in August 2014, Keystone outlined a plan with the Facility to come back into compliance. Mr. Vogel stated the plan is on pace and will be fully functioning in mid-April 2015. Mr. Ditty stated that the Facility is satisfied with the plan and the timeline is on schedule.

Mr. Vogel provided Inspector Kline and Mr. Ditty a tour of the Keystone operations including the production plating located in Building #1 and the anodizing line located in Building #2. Inspector Kline did comment that the overall general housekeeping was poor. Mr. Vogel escorted Inspector Kline and Mr. Vogel to the Water Treatment Area and specifically to where the effluent samples are collected **(See Photos #15, #16 & #17)**. A flowchart and analytical data logger were also stationed in this area **(See Photos #18 & #19)**. This equipment appeared to be operational. An annual calibration label was present. According to the label, the calibration expired on 5/22/2007. Mr. Vogel stated that all samples collected are grab samples. Grab samples are collected every two hours and used for the twenty-four hour composite sample. Collected samples are picked up on a bi-monthly schedule by Environmental Service Labs, Inc. Mr. Vogel stated that analytical reports for all samples collected are provided to the Facility.

Closeout Conference

Inspector Kline conducted a closeout conference at the Facility. Inspector Kline relayed his observation concerns about the Facility and Keystone Rustproofing, Inc. Inspector Kline stated that any outstanding, additional information or reports which were unavailable during the inspection could be sent to Inspector Kline.

Follow-up Communications

As of the date of preparing this report, no additional information was received by Inspector Kline.

Field Audit Inspection

New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068-2046

Facility Identification #PA0027411

photos taken by EPA Inspector Jim Kline

Photo #1

Field Audit Inspection

New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068-2046

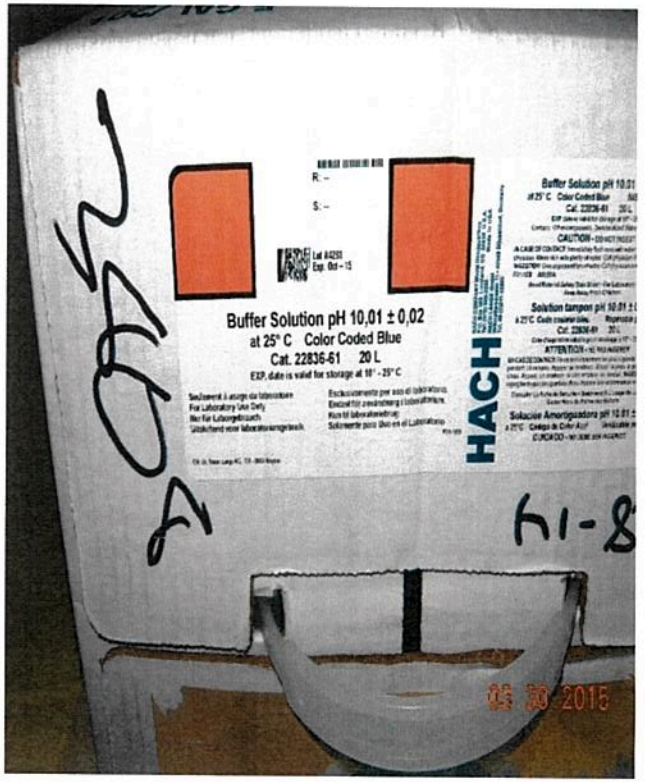
Facility Identification #PA0027411

photos taken by EPA Inspector Jim Kline

Photo #2

Photo #3

Photo #4



Field Audit Inspection

New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068-2046

Facility Identification #PA0027411

photos taken by EPA Inspector Jim Kline

Photo #5

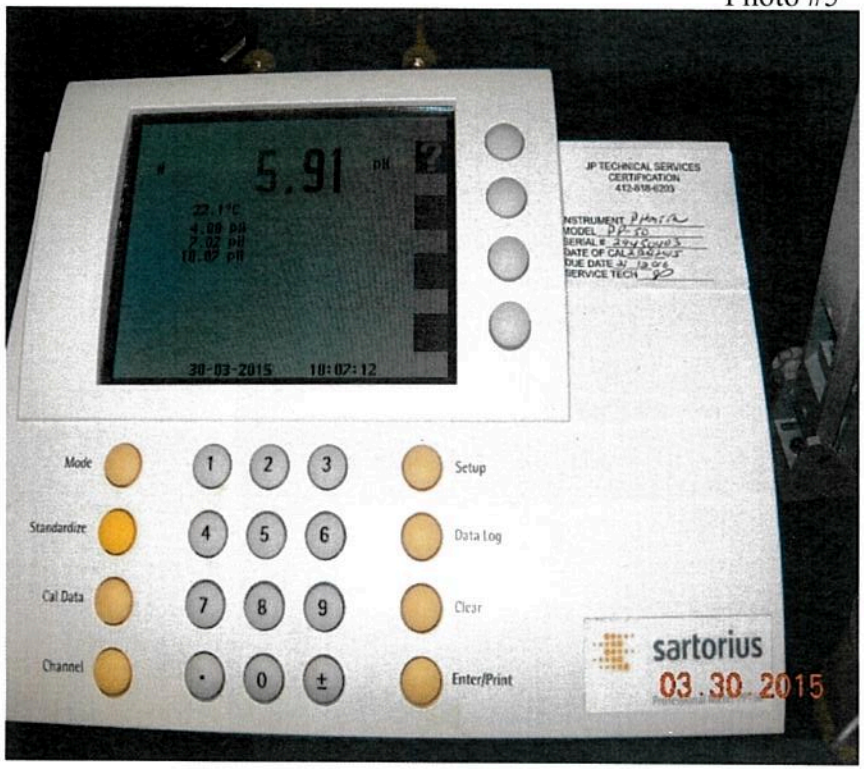
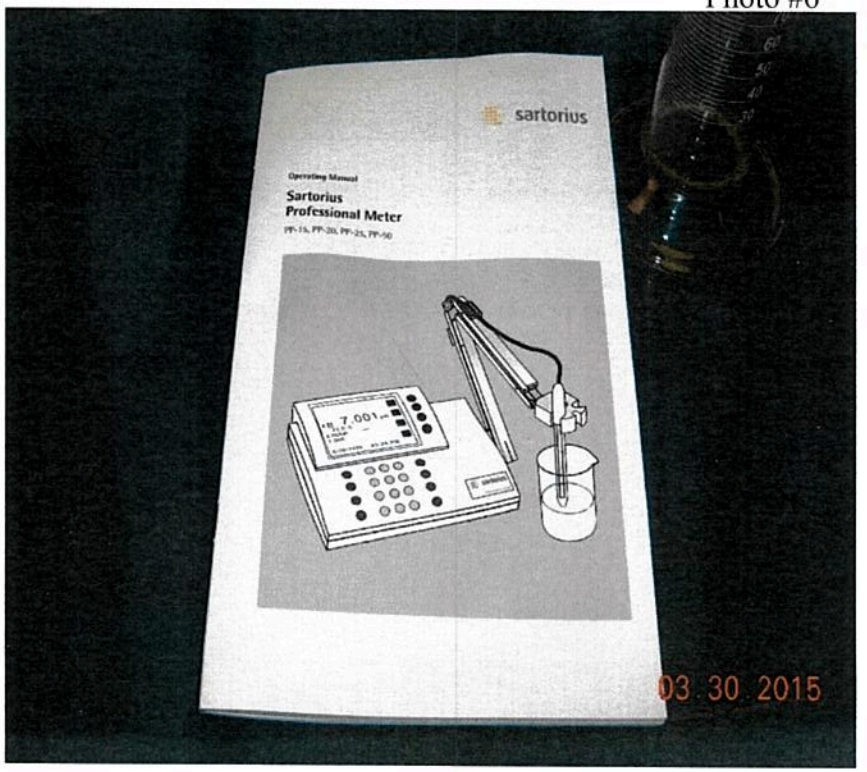


Photo #6



Field Audit Inspection

New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068-2046

Facility Identification #PA0027411

photos taken by EPA Inspector Jim Kline

Photo #7

Field Audit Inspection

New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068-2046

Facility Identification #PA0027411

photos taken by EPA Inspector Jim Kline

Photo #8

Photo #9

Field Audit Inspection

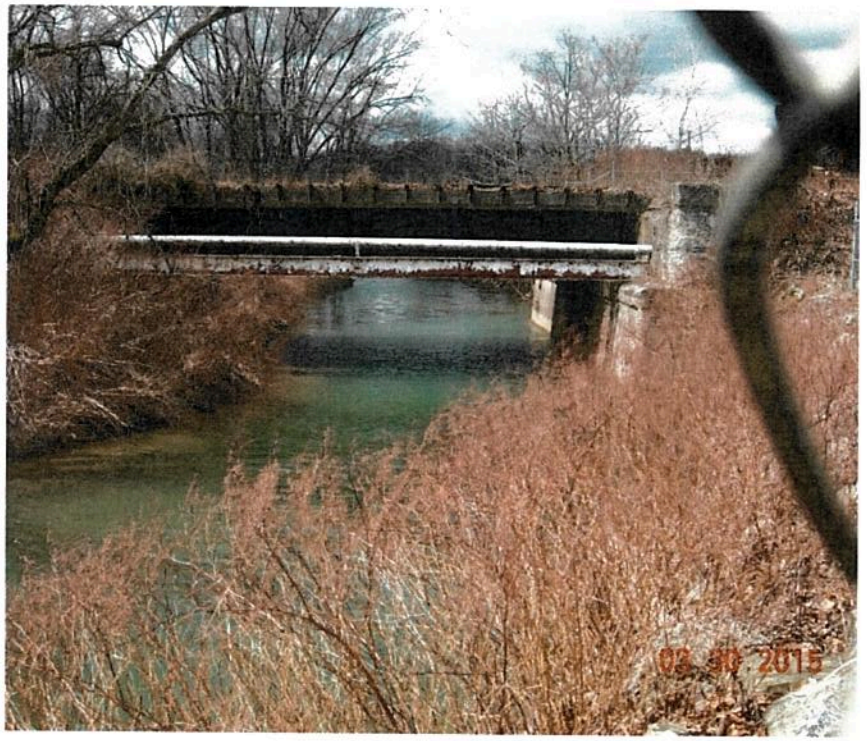
New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068-2046

Facility Identification #PA0027411

photos taken by EPA Inspector Jim Kline

Photo #10

Photo #11



Field Audit Inspection

New Kensington Municipal Sanitary Authority
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New Kensington, PA 15068-2046

Facility Identification #PA0027411

photos taken by EPA Inspector Jim Kline

Photo #12

Photo #13

Field Audit Inspection

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Facility Identification #PA0027411

photos taken by EPA Inspector Jim Kline

Photo #14

Field Audit Inspection

New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068-2046

Facility Identification #PA0027411

photos taken by EPA Inspector Jim Kline

Photo #15

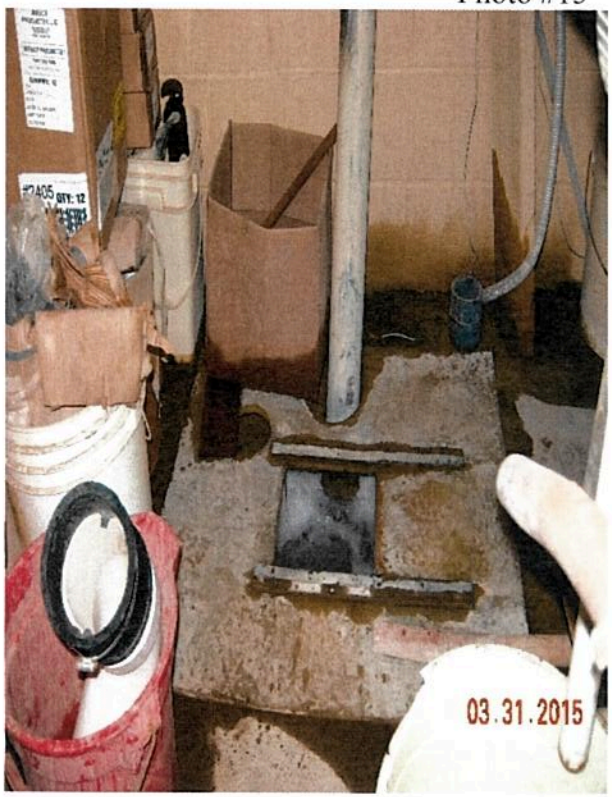


Photo #16

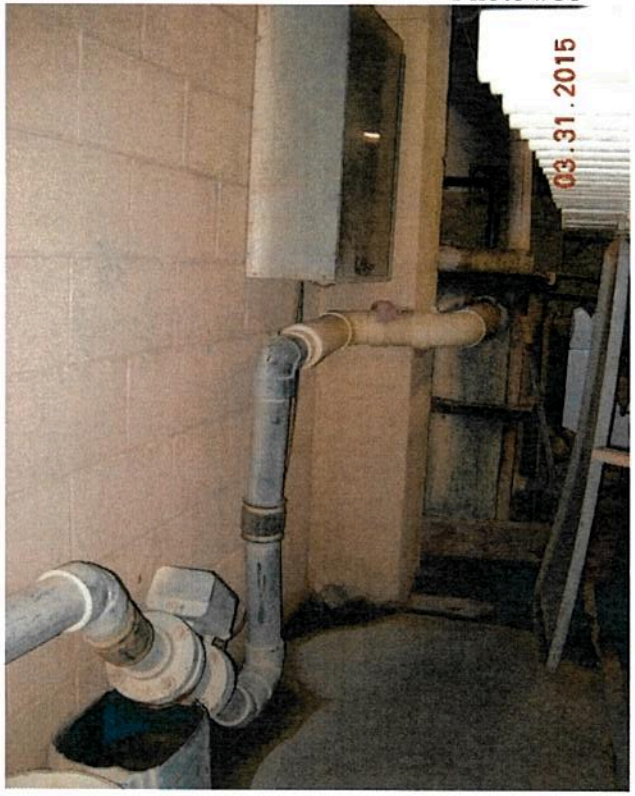
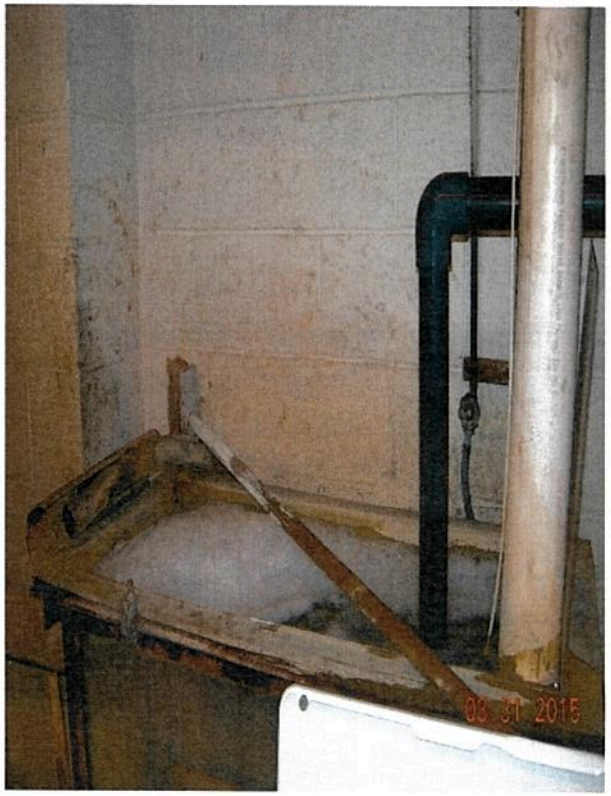


Photo #17



Field Audit Inspection

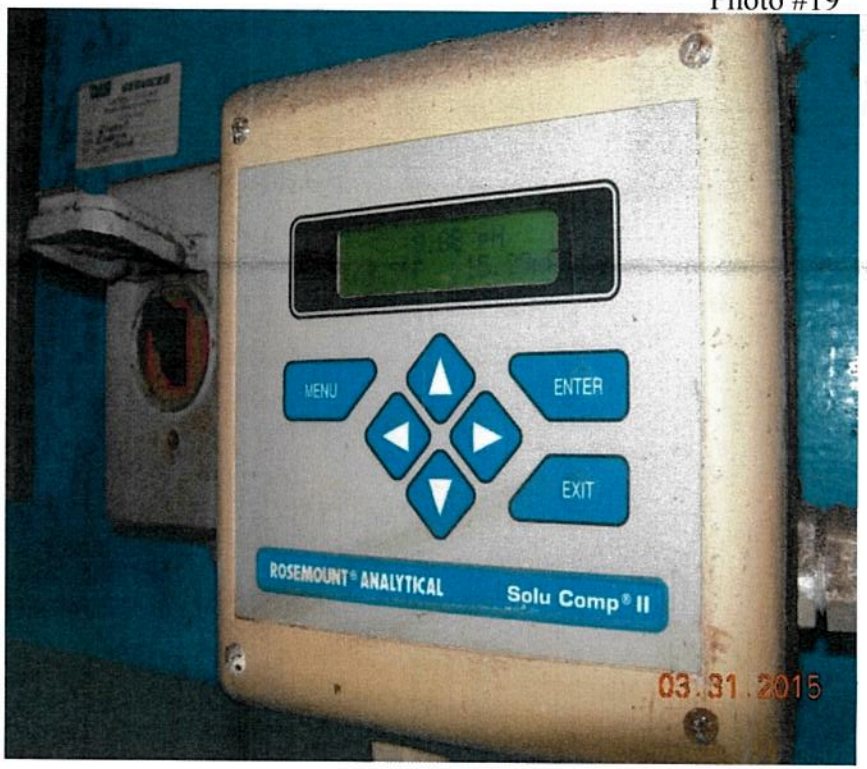
New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068-2046

Facility Identification #PA0027411

photos taken by EPA Inspector Jim Kline

Photo #18

Photo #19



POTW PRETREATMENT PROGRAM FIELD AUDIT CHECKLIST

Audit Date	POTW Name
March 30 and 31, 2015	**New Kensington Municipal Sanitary Authority # PA0027411**

Contact Name	Title	Telephone
Joseph Ditty	Pretreatment Coordinator	(724) 335-9607
Address	120 Logans Ferry Road New Kensington, PA 15068-2046	

	Yes	No
Should this be the person on the mailing list?	X	

If no, complete the following for the person to be on the mailing list:

Name	Title	Telephone
Address		

Participants				
	Name	Title	Organization	Telephone
1	**Curt Carion**	**Chief Operator**	**Washington WWTF**	**(724) 335- 9813**
2	**Jim Kline**	**Inspector**	**EPA-OECEJ**	**(304) 234-0263**

A. Background – Completed with Mr. Ditty and Mr Carion's input				
1	As required by the approved program, list frequency for:	CIU	SNIU	
	POTW sampling of IUs	Semi ann	Semi ann	
	POTW inspection of IUs	annual	annual	
	IU self-monitoring	qtr	qtr	
	IU reporting	qtr	qtr	
2	In the last year, indicate frequency of:	CIU	SNIU	
	POTW sampling of IUs	twice		
	POTW inspection of IUs	annual		
	If less than required by the approved program or less than 1/yr (403.8(f)(2)(v)), explain	none		
3	List all SIUs that were found to have been not sampled or not inspected at the last PCI or annual report			

Name of IU	NS/NI/B	Reason
NONE		

4	Does the annual report indicate any new CIUs?	Yes	No	
			X	

B. POTW Sampling and Inspection				
1	List the SIUs that were either not sampled or not inspected in the last 12 months (403.8(f)(2)(v)):			

Name of IU	NS/NI/B	Date planned/completed	
NONE			

2	Are pH, oil & grease, cyanide, volatile organics, total phenol, and sulfide collected by grab sample?	Yes	No	NA
		X	Do not sample red Not in process	
	If so, how many grab samples are used?	1 grab		
3	Are composite samples used for all other pollutants to evaluate compliance with: 1 Composites	Yes	No	NA
	Categorical standards?	X		
	Local limits?	X		
	Is any unannounced sampling conducted?	X		
4	Is POTW prepared to take samples on short notice (i.e., vehicles, personnel, preservatives, etc. available)?	X		
5	How much time normally elapses between sample collection and obtaining analytical results?		2-3 weeks	

6	Does POTW use QA/QC procedures such as:	Yes	No	NA
	Use of calibration and maintenance plan for sampling equipment?	X		
	Training for sampler?	X		
	Split samples (field)?	X		
	Training for analyst?	X		
	Duplicate samples (laboratory)?	occassional		
	Method blanks (laboratory)?	occassional		
	Spiked samples (laboratory)?	occassional		

C. IU Self-Monitoring and Reporting

1	As currently conducted, list frequency for:	CIU	SNIU	
	IU self-monitoring	bimonthly	qtr	
	IU reporting	bimonthly	qtr	
	If less than required by the approved program, explain	N/A		
2	If IUs sample more frequently than required, do they report all sampling results to the POTW (403.12(g)(5))?	Yes	No	NA
		X		
3	List all new source IUs	None		
	Have the following been received by all IUs which became new sources in the last 12 months (403.12))?	# received	# required	
	Baseline Monitoring Reports		none	
	Compliance Schedule Milestone Reports		none	
	90-day Final Compliance Reports		none	
	How does POTW verify the information in these reports?	3rd party lab samples and inspections		
4	Do any IUs discharge hazardous waste?	Yes	No	
			X	
	If no, how does POTW verify this?	**The POTW conducts visual inspections and reviews all applicant information on file**		
	If yes, has the IU submitted the proper notifications (403.12(p))?	Yes	No	NA
				X
5	Has the POTW evaluated each SIU to determine whether a plan or other action is required to control Slug Discharges (403.8(f)(2)(vi)?	Yes	No	NA
		X		
6	Has the POTW evaluated each SIU to determine whether a plan or other action is required to control Slug Discharges (403.8(f)(2)(vi)?	Yes	No	NA
		X		

INDUSTRIAL USER FILE EVALUATION			
IU Name	1. Keystone Rustproofing Inc.		
Category	(See attachment #4)	PWF	
Reg. Params.			
Address			
Comments			
IU Name	2. Farmland Foods		
Category	(See attachment #4)	PWF	
Reg. Params.			
Address			
Comments			
IU Name	3. Schreiber Industrial Development Company		
Category	(See attachment #4)	PWF	
Reg. Params.			
Address			
Comments			
IU Name	4. Alle-Kiski Medical Center		
Category	(See attachment #4)	PWF	
Reg. Params.			
Address			
Comments			

INDUSTRIAL USER FILE EVALUATION			
IU Name	5. Unifirst Corporation		
Category	(See attachment #4)	PWF	
Reg. Params.			
Address			
Comments			
IU Name	N/A		
Category		PWF	
Reg. Params.			
Address			
Comments			
IU Name			
Category		PWF	
Reg. Params.			
Address			
Comments			
IU Name			
Category		PWF	
Reg. Params.			
Address			
Comments			

NOTE: Complete all questions with a "Y" (yes), "N" (no), "N/A" (not applicable), "U" (unable to determine), or the appropriate number.

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
A. Industrial User Characterization				
1. Is the IU categorical (CIU), significant non-categorical (SNIU) or other (O)?	CIU			
2. Is the IU properly categorized?	Yes			
B. Control Mechanism				
1. Does the file contain:				
• an updated control mechanism application and/or survey questionnaire?	Yes			
• a current control mechanism?	Yes			
• documentation of how control mechanism limits and requirements were established?	Yes			
2. Were local limits and/or categorical standards properly applied?	Yes			
3. If applicable, were production-based standards correctly applied?	Yes			
4. If applicable, was the combined wastestream formula correctly applied?	N/A			
5. If applicable, were TTO requirements or alternatives correctly applied?	N/A			
6. In the inspector's opinion, is the sample frequency sufficient to determine compliance?	NO			
7. Does the control mechanism include:				
• sampling location and frequency?	YES			
• sample type?	YES			
8. Is the permit effective for 5 years or less?	1 yr			
C. POTW Inspections of IUs				
1. How many POTW inspections were conducted and documented in the last 12 months?	1			
2. Does the inspection report include:				
• inspector name?	YES			
• inspection date/time? Yes date/ No time	YES			
• name of IU official contacted?	Yes			

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
• review of manufacturing facilities?	Yes			
• verification of production data if needed?	Yes			
• identification of wastewater sources, flow and types of discharge?	Yes			
• condition of pretreatment facilities?	remarks			
• evaluation of chemical storage areas?	remarks			
• evaluation of need for spill/slug control plan at least every 2 years?	Yes			
• evaluation of spill/slug control procedures?	Yes			
• evaluation of housekeeping practices?	No remarks			
• evaluation of potential for hazardous waste discharge?	Yes			
• evaluation of self-monitoring equipment and techniques?	Yes			
• evaluation of lab procedures?	No			
• evaluation of monitoring records?	Not during inspection			
D. POTW Sampling of IUs				
1. How many sampling visits were conducted and documented in the last 12 months?	2			
2. Does the sampling documentation include:				
• name of sampling personnel?	YES			
• sample date/time?	YES			
• sample type?	YES			
• sample location? In permit	YES			
• wastewater flow during sampling?	Yes			
• sample preservation? Done by SRM pre loaded/pre preserved	YES			
• chain of custody?	YES			
• analytical methods used?	YES			
• analysis date?	YES			
• name of analyst?	YES			
• all analytical data?	YES			
3. Were all regulated parameters monitored?	YES			
4. Were 40 CFR 136 analytical methods used?	YES			

E. IU Self-Monitoring and Reporting				
1. Has the IU submitted all required self-monitoring reports in the last 12 months?	YES			
2. Were all regulated parameters monitored at the required frequency?	YES			
F. Slug/Spill Control				
1. Have any slugs/spills been documented in the file?	YES			
2. Did the POTW require development of a slug/spill control plan?	YES			
3. Has the IU developed a slug/spill control plan?	YES			
4. Does the slug/spill plan contain:				
• description of discharge practices?	YES			
• description of stored chemicals?	YES			
• procedures to prevent slugs/spills?	YES			
• procedures to notify POTW of slugs/spills?	YES			
• follow-up practices to minimize damage from slugs/spills?	YES			

To: Region 3 Philadelphia

OECEJ

Attn: Jose Jimenez

3EC00

From: Wheeling Ops. Office

OECEJ

Jim Kline

Subject: Field Audit

New Kensington POTW

16 Attachments

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
FACILITY INSPECTION PROGRAM
Wheeling Operations Office
1060 Chapline Street
Wheeling, West Virginia 26003-2995
(304) 234-0263

New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068

Facility Identification #PA0027411

CWA- Field Audit

Attachment # 1 of 16

P TECHNICAL SERVICE
PERFORMANCE VERIFICATION

CUSTOMER NEWTON SAN AUTH	MANUFACTURER SANTORIUS
LOCATION LAB	MODEL # PP-50
ID # N/A	SERIAL # 29450403
DESCRIPTION: pH METER ☐ Non-Battery Operated ☐ Battery Operated ☑ DIGITAL ☐ ANALOG	

INSTRUMENT TOLERANCE				
PH:	± .2	☐ % ☑ Value	☑ Manufacturer Specified	☐ Customer Specified
MV:	± .2	☐ % ☑ Value	☐ Manufacturer Specified	☐ Customer Specified
Temperature:	± 1°C	☐ % ☐ Value	☐ Manufacturer Specified	☐ Customer Specified
Instrument Found In Tolerance		☑ Yes	☐ No-Specify Out Tolerance Condition	

Using customer electrode system and buffers record Low / Mid / Hi pH values in table below prior to performing PM ☑

pH Buffer Value	4PH	7PH	10PH
AS FOUND READING	3.94	6.98	10.02

Calibrate temperature using NITS certified instrument and recorded readings below after performing PM ☑

Temperature	AS FOUND READING	AS LEFT READING
	21.4°C	21.5°C 21.5°C

As Left Reading In Tolerance ☑ Yes ☐ No ☐ N/A

Electrical inspection- power cord, ground continuity and line voltage (if applicable) ☑

Ground Continuity	0 Ω	Line Voltage	118 VAC

Check pH meter using a NITS certified mill-volt (MV) source and record readings in table below after performing PM ☑

Input Voltage	AS FOUND READING	AS LEFT READING
+177.5 mv (pH 4)	177.4	
0.0 mv (pH 7)	0.0	SAME
-177.5 mv (pH 10)	-177.5	SAME

As Left Reading In Tolerance ☐ Yes ☐ No

Inspect and service electrode holder / stand (if applicable) ☑

Inspect and service electrodes and temperature probe as needed ☑

Clean exterior of pH meter ☑

Check zero span with shorting strap ☑

Review maintenance procedures with customer ☑

Calibrate using customer buffers and record readings in table below after performing PM ☐

pH Buffer Value	AS FOUND READING	AS LEFT READING
4PH	3.94	SAME
7PH	6.98	SAME
10PH	10.02	

Certified Buffers Used ☐ Yes ☐ No

If Certified Buffers Used The As Left Reading Is:

In Tolerance ☐ Out of Tolerance ☐ N/A ☐

DATE: 2/26/2015	TEST EQUIPMENT	
NEXT DUE: 2/2016	DESCRIPTION	CERT # / SERIAL #
S/O # 22515	1- TEMP	4850042
FSD REP #:	2- DUR	5145149
PROCEDURE #	3- BUCKS	

Comments: ☐ Yes - Enter comments on reverse side. ☑ No

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Wheeling Operations Office
1060 Chapline Street
Wheeling, West Virginia 26003-2995
(304) 234-0263

New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068

Facility Identification #PA0027411

CWA- Field Audit

Attachment # 2 of 16

Lo-(-5) °F

DATE: 2/15/15 ANALYST: (N) WEATHER: partly sunny TEMP: Hi- 6 °F

	TIME	
1	7:12	Sample influent.
2	7:23	Sample effluent from autosampler. (Take grab for chlorine residual, pH, and fecal coliform)
3	7:33	pH Calibration and Results: Effluent 6.88 SU
4	7:48	Chlorine residual calibration and result: Effluent 0.362 mg/L
5	—	

Influent Flow (MGD)	6.16	Bypass Flow (gal)	197208
RAS Flow (MGD)	2.02	Bypass Peak (gal)	1233
WAS In (MGD)	0.089	Bypass Time (min)	608
WAS out (Gal.)	7562.5	Effluent Flow (MGD):	4.96

6 10:08 Record chlorine scale weight:

Tank #	Day before weight	Todays wt.	Total wt.
1	1426	1327	99
2	18	10	8
			107

7 — Sample mixed liquor and RAS

8 — ML settable solids curve:

Time (min.)	SSV (cc/L)	Time (min.)	SSV (cc/L)
0	1000	25	—
5	—	30	—
10	—	40	—
15	—	50	—
20	—	60	—

SVI: —

9 8:08 Suspended Solids (mg/L):

Blank	Effluent	ML	RAS
0	3	—	—

10 8:37 BOD/CBOD calibration and results (mg/L):

Influent BOD (mg/L)	Effluent CBOD (mg/L)
71	13

11 9:50 Put fecal coliforms in H2O bath. Blank: 100mL, # colonies 0

mL Sample	50	#colonies	52
mL Sample	—	#colonies	—
mL Sample	—	#colonies	—

AVG: 104

12 — Decant transfer pump flow (gal): 32158

13 — Record Secondary DO's:

Tank #1 -	Front: 2.3	Middle: 3.9	Back: 1.0
Tank #2 -	Front: 7.2	Middle: 5.0	Back: 1.1

14 —

Digester #1 Temp (°F):	94.4	Digester #1 Level (ft):	
Digester #2 Temp (°F):	93.8	Digester #2 Level (ft):	
		Digester #3 Level (ft):	23.1

Notes and Comments:

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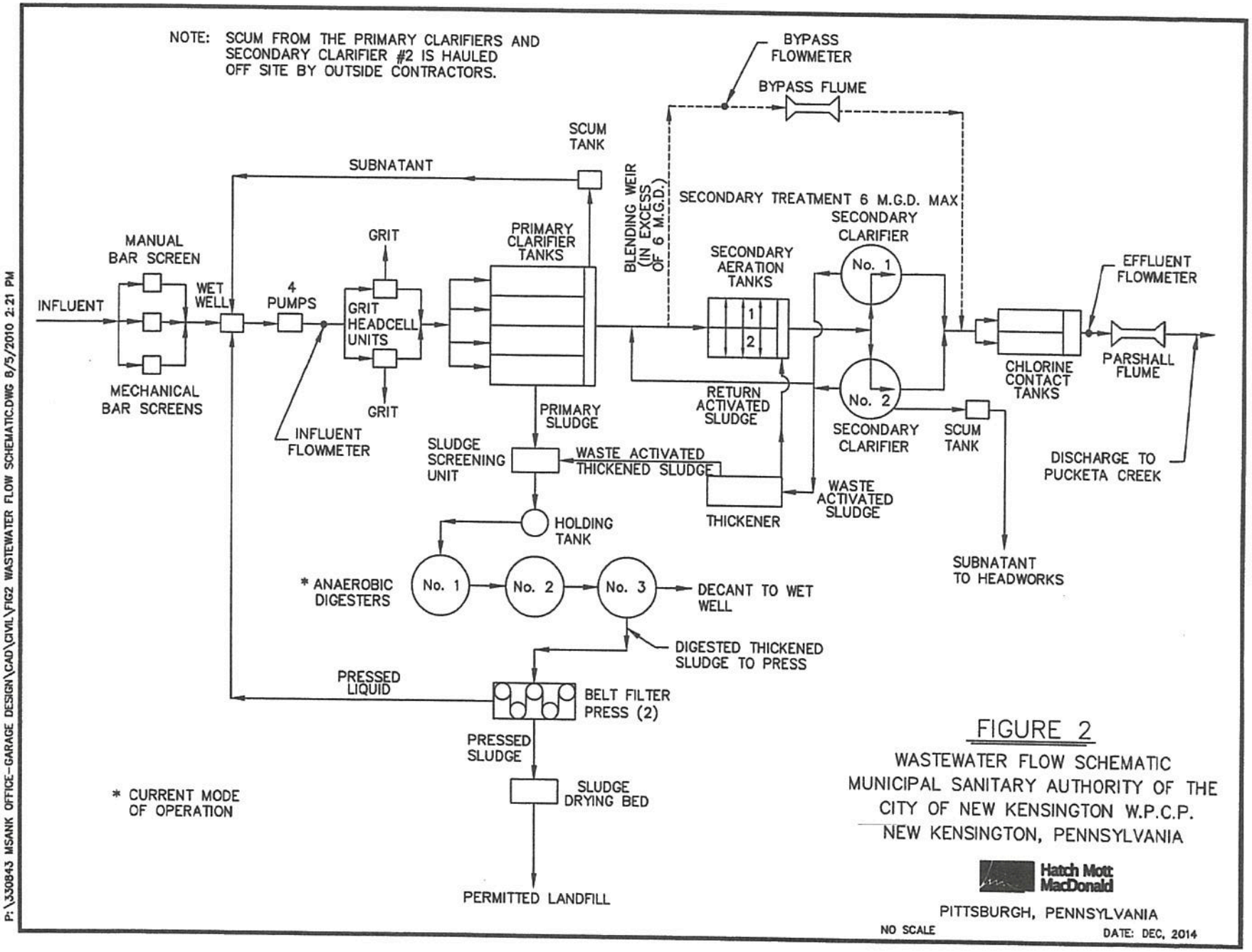
CWA- Field Audit

Attachment # 3 of 16



P:\330843 MSANK OFFICE-GARAGE DESIGN\CAD\CIVIL\FIG2 WASTEWATER FLOW SCHEMATIC.DWG 8/5/2010 2:21 PM

FIGURE 2

WASTEWATER FLOW SCHEMATIC
MUNICIPAL SANITARY AUTHORITY OF THE
CITY OF NEW KENSINGTON W.P.C.P.
NEW KENSINGTON, PENNSYLVANIA

Hatch Mott MacDonald

PITTSBURGH, PENNSYLVANIA

NO SCALE

DATE: DEC, 2014

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Attachment # 4 of 16

MUNICIPAL SANITARY AUTHORITY
OF THE CITY OF NEW KENSINGTON, PA.
PRETREATMENT PROGRAM
SIGNIFICANT INDUSTRIAL USERS DIRECTORY

1. **CASTLE CO-PACKERS**
   Building 204-B
   Schreiber Industrial District
   Arnold, Pa. 15068

   Contact: Tracy Petruzzi / Brian Dworkin
   Phone: 724-339-4040

2. **CITIZENS AMB. CARE CENTER**
   Alle-Kiski Medical Center
   651 Fourth Avenue
   New Kensington, Pa. 15068

   Contact: Lorraine Azzarone
   Phone: 724-334-4770
   FAX: 724-334-4771

3. **FARMLAND FOODS CORP.**
   2200 Rivers Edge Drive
   Arnold, Pa. 15068-4542

   Contact: James Balint / Mark Wilhelm
   Phone: 724-335-2512 / 724-335-8054

4. **KEYSTONE RUSTPROOFING, INC.**
   1901 Dr. Thomas Boulevard
   Arnold, Pa. 15068-4398

   Contact: Larry Vogel / Paul Gunsallus
   Phone: 724-339-7588

5. **SCHREIBER IND. DISTRICT**
   5840 Ellsworth Avenue
   Suite 100
   Pittsburgh, Pa. 15232

   Contact: David Davis / David Schreiber
   Phone: 412-292-5428 / 412-362-7221

6. **UNIFIRST CORPORATION**
   1150 Second Avenue
   New Kensington, Pa. 15068

   Contact: Steve Potoka / Kevin Stover
   Phone: 724-339-1077

November 25, 2014

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
FACILITY INSPECTION PROGRAM
Wheeling Operations Office
1060 Chapline Street
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(304) 234-0263

New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068

Facility Identification #PA0027411

CWA- Field Audit

Attachment # 5 of 16

schreiber
industrial development
company

SCHREIBER INDUSTRIAL DISTRICT / 5840 ELLSWORTH AVENUE, SUITE 100, PITTSBURGH, PA 152
(412) 362-7221 • (724) 339-7501 / FAX (412) 362-6530
www.westernpennsylvaniarealestate.com

June 9, 2014

Mr. Joseph F. Ditty, Pretreatment Coordinator
The Municipal Authority of the City
of New Kensington
120 Logans Ferry Road
New Kensington, Pennsylvania 15068-2046

RE: Schreiber Industrial District
Pretreatment Permit - No. SMN-000400

Dear Mr. Ditty,

I am the Managing Partner of the Schreiber Industrial District, an industrial/commercial park located in the City of New Kensington. In short, I serve only as the landlord of the industrial/commercial park and conduct no other business at this site. As the landlord, I am responsible for the operation and maintenance of the grounds and the private sewer system serving the tenants, and this system includes sewers and two pump stations.

The occupied buildings on the site are either tapped directly into the Municipal Authority's sewers or into the private sewers, which discharge into the two pump stations. The two pump stations periodically pump the collected sewage to the Municipal Authority's sewers.

The following two tables identify the tenants that currently lease space in the park and the pump station to which their wastewater flows. This table also identifies the type of business conducted, the approximate number of employees, and the nature of the wastewater generated and discharged.

Upper Pump Station

Tenant	Business/Usage	Notes
Annford	Soap Formulator	1 employee Process and Sanitary Wastewater
Habasco	Sales Office	2 employees Sanitary Only
Best Air Systems	Cleaning of filters	Process and sanitary waste water

Building 238/	Distribution warehouse	4 employees Sanitary waste water

Lower Pump Station

Tenant	Business/Usage	Notes
Vere	Optical Products	4 -5 employees Sanitary Only
Farmland	Warehouse	1 employee Sanitary Only
Iron Master	Warehouse	2 employees Sanitary Only
Mineral Processing Specialties	Crushed Stones and other landscaping products	3 – 4 employees Sanitary Only

As the above table demonstrates, the Lower Pump Station only receives sanitary sewage from the tenant's restroom facilities. The discharge from the Upper Pump Station is also sanitary sewage with the exception of wastewater from Annford. Previous correspondence with the Municipal Authority indicated that Annford is a Categorical Industrial User subject to pretreatment standards identified in 40 CFR Part 417, Subpart H-Manufacturer of Liquid Soaps. See June 7, 2010 Letter from Lloyd Snell to the Municipal Authority. Based on this, the Municipal Authority should permit Annford and not Schreiber Industrial District. Because the Schreiber Industrial District only collects and conveys sanitary sewage to the Municipal Authority from parts of the industrial/commercial park, I have only completed Sections A-D of the Municipal Authority's Industrial/Commercial Waste Questionnaire (see attached).

In sum, Schreiber Industrial District is not an industrial user, and its sewage pump stations are not required to be permitted.

Very truly yours,

David L. Schreiber

Enclosure

cc: David W. Wagner, Esq.

SECTION A – GENERAL INFORMATION

A-1.

Facility Name:	Schreiber Industrial District
Address:	12th Street
City, State, Zip Code:	New Kensington, PA 15066
Telephone Number	(724) 339-7501

A-2. Address of production or manufacturing facility:

Address is same as in A.1 [X]

Address:	
City, State, Zip Code:	
Telephone Number	

A-3. Designated signatory authority of the facility

(Attach similar information for each authorized representative)

Name:	David L. Schreiber
Title:	Managing Partner, Schreiber Industrial Development Company
Address:	5840 Ellsworth Avenue
City, State, Zip Code:	Pittsburgh, PA 15323
Telephone	(412) 621-3357

A-4. Designated facility contact person

Name:	David Davis
Title:	Maintenance Coordinator
Address:	Schreiber Industrial District, 12th Street
City, State, Zip Code:	New Kensington, PA 15068
Telephone Number:	(412) 292-5428

A-5. Does this establishment discharge only sanitary waste into the sanitary sewer system?

[X] YES [ ] NO

If YES, Complete Sections A through D.

If NO, Complete Entire Questionnaire.

SECTION B – BUSINESS ACTIVITY

B-1. Identify the type of business conducted on the premises described in A.2 (eg: machine shop, electroplating, warehousing, painting, printing, meat packaging, food processing, etc.)

Schreiber Industrial Development Company conducts only space leasing on the site. See transmittal letter for business descriptions of tenants.

B-2. Provide a brief narrative description of the manufacturing, production, and/or service activities your facility conducts.

See transmittal letter for business descriptions of tenants.

B-3. Indicate all applicable Standard Industrial Classification (SIC) for all processes (If more than one SIC applies, list in descending order of importance.):

4952 – Sewerage System

B-4. If your facility employs or will be employing processes in any of the industrial classification or business activities listed below (regardless of whether they generate wastewater, waste sludge, or hazardous wastes), place a check beside the category or business activity. Check all categories that apply.

Industrial Categories/Business Activities

[ ] Aluminum Forming
[ ] Asbestos Manufacturing
[ ] Battery Manufacturing
[ ] Builder's Paper
[ ] Carbon Black
[ ] Coil Coating
[ ] Copper forming
[ ] Dairy Products Processing
[ ] Electrical and Electronic Components
[ ] Electroplating
[ ] Feedlots
[ ] Ferroalloy Manufacturing
[ ] Fertilizer Manufacturing
[ ] Fruits and Vegetables Processing Manufacturing
[ ] Glass Manufacturing
[ ] Grain Mills Manufacturing
[ ] Ink Formulating
[ ] Inorganic Chemical
[ ] Iron and steel Manufacturing
[ ] Leather tanning and Finishing
[ ] Meat Processing
[ ] Metal Finishing
[ ] Metal Molding and Casting
[ ] Nonferrous Metals Forming
[ ] Nonferrous Metals Manufacturing
[ ] Paint Formulating
[ ] Paving and Roofing (Tars and Asphalt)
[ ] Pesticides
[ ] Petroleum Refining
[ ] Pharmaceuticals
[ ] Phosphate Manufacturing
[ ] Plastic Molding and Forming
[ ] Porcelain Enameling
[ ] Pulp and Paper
[ ] Rubber Processing
[ ] Seafood Processing
[ ] Soaps and Detergents Manufacturing
[ ] Steam Electric

[ ] Sugar Processing
[ ] Textile Mills
[ ] Timber Products Manufacturing

A facility with processes inclusive in these business areas may be covered by Environmental Protective Agency's (EPA) Categorical Pretreatment Standards. These facilities are termed "Categorical Industrial Users."

B-5. If your facility employs or will be employing processes in any of the categories or business activities listed below (regardless of whether they generate wastewater, waste sludge, or hazardous wastes), place a check beside the category or business activity. Check all categories that apply

Not applicable to Schreiber Industrial Development Company.

[ ] Beverage Bottler
[ ] Car Wash
[ ] Dry cleaning
[ ] Food/Edible Products Processor
[ ] Hospital/Personal Care Facility
[ ] Landfill
[ ] Laundry
[ ] Photo Processing
[ ] Radiator repair
[ ] Septage hauler
[ ] Service/Gasoline Station
[ ] Truck Cleaners

Boiler Feed	None	
Process	None	
Sanitary	Usage by Tenants	Master Meters
Air Pollution Control	None	
Contained in Product	None	
Plant and Equipment Washdown	None	
Irrigation and Lawn Watering	None	
Other (Specify)	None	
TOTAL WATER USAGE		Master Meters

SECTION C – WATER SUPPLY

C.1 Indicate the amount of water obtained from each of the follow sources:

SOURCE	ANNUAL QUANTITY (GALLONS)
Private well	None
Surface water	None
Municipal Water Supply (Specify Water Authority)	New Kensington Water Authority
Other (Specify)	None

C.2 Describe any raw treatment processes in use at your facility

Not applicable to Schreiber Industrial Development Company

C.3 Provide the following information as it appears in your Municipal Water Bill:

Name: Schreiber Industrial Development Company

Address: 5840 Ellsworth Avenue

City, State, Zip Code: Pittsburgh, PA 15232

Telephone Number: (412) 362-7221

Water Service Account Number: _____

C.4 Provide information regarding the average amount of water used for each of the following activities. Indicate whether water usage has been estimated (E) or measured (M).

TYPE	Average Water Used (GPD)	ESTIMATED (E) OR MEASURED (M)
Contact cooling	None	
Non-Contact Cooling Water	None	

SECTION D – SEWER INFORMATION

D-1. For an Existing Facility:

Is the building presently connected to the public sanitary sewer system?

[X] YES- Sanitary Sewer Account Number: _____

[ ] NO- have you applied for a sanitary sewer hookup?

[ ] YES [ ] NO

For a New Facility

Will you be occupying an existing vacant building (such as an industrial park)?

[ ] YES [ ] NO

Have you applied for a building permit if a new facility will be constructed?

[ ] YES [ ] NO

Will you be connected to the public sanitary sewer system?

[ ] YES [ ] NO

D-2. Does (or will) this facility discharge any wastewater other than sanitary sewage to the public sanitary sewer system

[ ] YES – If YES, complete the remainder of the questionnaire.

[X] NO – If NO, stop here.

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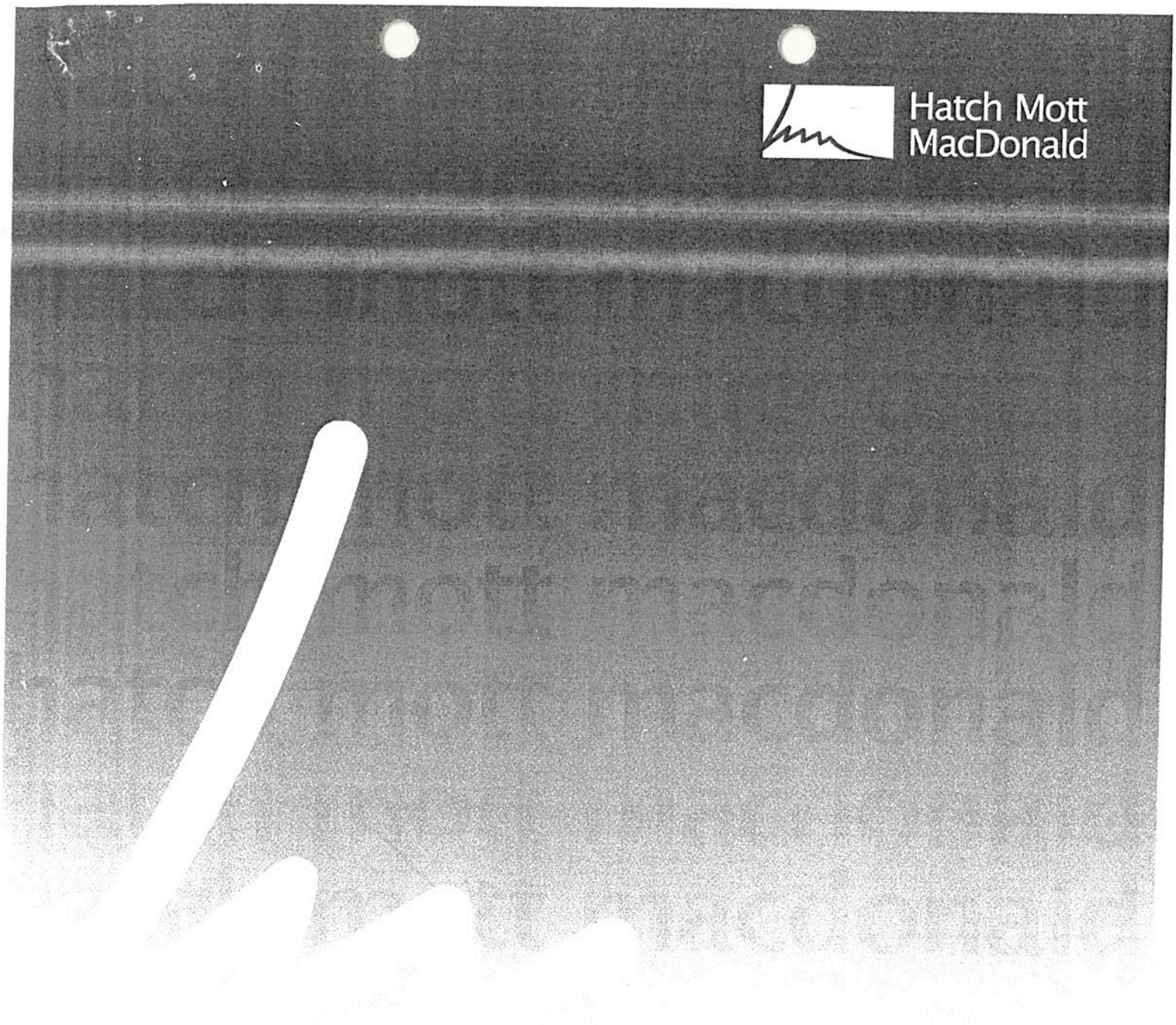
120 Logans Ferry Road
New Kensington, PA 15068

Facility Identification #PA0027411

CWA- Field Audit

Attachment # 6 of 16



Hatch Mott MacDonald

Pretreatment Annual Report for Reporting Year 2014

Municipal Sanitary Authority of the City of New Kensington

March 2015

Prepared by: Hatch Mott MacDonald

351383AA01

Addresses for these facilities are as follows:

1. Castle Co-Packers, LLC
   Building 204B
   Schreiber Industrial District
   Arnold, PA 15068

2. Alle-Kiski Medical Center
   (Citizens Ambulatory Care Center)
   651 Fourth Avenue
   New Kensington, PA 15068

3. Smithfield Farmland (Farmland Foods) Corporation
   2200 Rivers Edge Drive
   Arnold, PA 15068

4. Schreiber Industrial Development Company
   P.O. Box 691
   New Kensington, PA 15068

MSANK requests an updated listing of all companies located in the Schreiber Industrial Park annually. Schreiber provided an updated list of the tenants in the industrial park in 2014. There were one (1) tenant closed and two (2) new tenants listed for 2014 compared to the previous tenant listing provided by Schreiber.

The facilities (previously listed for 2013) are as follows: Anford, Inc./Lloyd Snell (car wash detergent blending), Best Air Systems (air filter cleaning), Ken Clifton (motor home), HABSCO (Office), Ironmaster LLC, which hauls and stores precious metals (dry storage), McClure Johnston (roofing supplies), Mineral Processing Specialties (metal recycling plant), Performance Spray (spray equipment), Siemens Westinghouse (warehouse), Smithfield Farmland (dry storage of spices), Specialty Alloy Processing Company (heat treated metal), United Energy (Masonry on steel rollers), and Vere, Inc. (optical).

The one (1) business closed in 2014 was Dynagrind (machine shop). The new businesses listed were Kapelewski Maintenance (Snowplow) and Gentile Manufacturing (dry storage).

5. Unifirst Corporation
   1150 Second Avenue
   New Kensington, PA 15068

3. Keystone Rustproofing, Inc.: Keystone Rustproofing (Keystone) was in SNC during 2014. The MSANK sampling event on February 27-28, 2014 indicated Nickel and Zinc Permit/TRC limit exceedences. MSANK issued a Notice of Violation dated March 21, 2014 (attached). Keystone provided a response letter dated April 28, 2014 (attached). MSANK issued a Penalty Assessment letter dated June 18, 2014 (attached). MSANK considered a penalty for exceedences from September 2013 to February 2014 at its July 21, 2014 meeting and issued a $33,000.00 Penalty. MSANK issued a Penalty Notification dated July 22, 2014 (attached). MSANK issued a Compliance Schedule dated March 12, 2014 (attached). MSANK sent a permit application questionnaire on May 28, 2014 (attached). The returned permit application did not indicate a need to change Keystone's 2015 Permit. Keystone provided a Second Quarter Report dated July 17, 2014 that addressed an Ultra Filtration Unit to be installed by early 2015 (attached). The MSANK sampling event on June 25-26, 2014 indicated two (2) Zinc Permit/TRC limit exceedences. MSANK issued a Notice of Violation dated July 16, 2014 (attached). Keystone provided a response letter dated September 2, 2014 (attached). MSANK issued a Penalty Assessment letter dated September 3, 2014 (attached). MSANK considered a penalty for the June Zinc exceedences at its October 20, 2014 meeting and issued a $6,000.00 Penalty. MSANK issued a Penalty Notification dated October 21, 2014 (attached). Keystone provided a Third Quarter Report dated September 15, 2015 (attached). Keystone's July 30, 2014 Self-Monitoring Report indicated a Nickel Permit/TRC limit exceedence. MSANK issued a Notice of Violation dated September 17, 2014 (attached). MSANK issued a Penalty Assessment letter dated December 8, 2014 (attached). MSANK considered a penalty for the July Nickel exceedence at its January 19, 2015 meeting and issued a $6,000.00 Penalty. MSANK issued a Penalty Notification dated January 19, 2015 (attached). Keystone provided a Fourth Quarter Report dated January 16, 2015 (attached). The MSANK sampling event on December 16-17, 2014 indicated Nickel and Zinc Permit/TRC limit exceedences. MSANK issued a Notice of Violation dated January 21, 2015 (attached). MSANK will consider further action.

4. Schreiber Industrial District: Schreiber Industrial District (Schreiber) was in SNC during 2014. MSANK inspected Best Air Systems (Best Air) in Schreiber on March 13, 2014. Best Air cleans restaurant air filters and was discharging their wastewater through a pipe in the wall. The pipe led outside into a small grease separator that discharged onto the ground (see attached pictures). MSANK notified the PA Department of Environmental Protection (DEP) agent David Roote, who met me at Best Air on March 14, 2014. DEP witnessed the discharge and issued an Inspection Report dated March 27, 2014 (attached). MSANK was in contact with Best Air who indicated they would pipe the discharge back inside the building to the permitted Schreiber Building 242 Pump Station (242 PS). MSANK met with Best Air and David Roote on May 6, 2014 to inspect their new discharge operation. DEP issued an

Inspection Report dated May 13, 2014 (attached). MSANK sent a permit application questionnaire on May 28, 2014 (attached). The returned permit application did not indicate a need to change Schreiber's 2015 Permit. Schreiber's Second Quarter Report indicated CBOD and Zinc Permit/TRC limit exceedences at the 242 PS.
MSANK issued a Notice of Violation dated July 16, 2014 (attached). Schreiber provided a response letter dated August 13, 2014 (attached). MSANK issued a Penalty Assessment letter dated September 3, 2014 (attached). Schreiber provided a response letter dated September 10, 2014 (attached). MSANK considered a penalty for the June Zinc exceedence at its September 15, 2014 meeting and issued a $2,000.00 Penalty. MSANK issued a Penalty Notification dated September 16, 2014 (attached). Schreiber's Third Quarter Report indicated CBOD and Zinc Permit/TRC limit exceedences at the 242 PS. MSANK issued a Notice of Violation dated October 14, 2014 (attached). MSANK sampled Schreiber on October 2-3, 2014, which indicated CBOD, Oil and Grease, and Zinc Permit/TRC limit exceedences at the 242 PS. MSANK issued a Notice of Violation dated October 21, 2014 (attached). Schreiber provided a response letter dated November 10, 2014 (attached). MSANK issued a Penalty Assessment letter dated December 8, 2014 (attached). MSANK considered a penalty for the September and October CBOD, Oil & Grease, and Zinc exceedences at its December 15, 2014 meeting and issued an $11,000.00 Penalty. MSANK issued a Penalty Notification dated December 16, 2014 (attached). MSANK sampled Best Air on October 2, 2014, which indicated excessive CBOD and Zinc concentrations (attached). Best Air sent an e-mail response on October 29, 2014 with pictures of a new treatment system (attached). MSANK sampled Best Air on November 17, 2014, which indicated excessive CBOD and Zinc concentrations (attached). Schreiber indicated that Best Air would cease discharging into their 242 PS and also would clean out the 242 PS (by mid-December). MSANK sampled Schreiber on December 17-18, 2014, which indicated compliance. Schreiber's Fourth Quarter Report indicated a Zinc Permit/TRC limit exceedence at the 242 PS. MSANK issued a Notice of Violation dated January 29, 2015 (attached). The MSANK Enforcement Committee will be considering further action on this matter. MSANK inspected Best Air on January 22, 2015 and Best Air said that they had changed their treatment system by adding a filter for zinc removal as part of a new tank discharge (photos attached). MSANK sampled Best Air at that time, which indicated excessive CBOD and Zinc concentrations (attached). MSANK provided these results to Schreiber.

5. Smithfield Farmland (Farmland Foods): Smithfield Farmland (Smithfield) was in non-compliance during 2014. MSANK sent Smithfield a copy of the EPA Public Notice concerning approval of modifications to the Pretreatment Program (attached). Smithfield's February 2014 Self-Monitoring Report indicated two CBOD fine limit exceedences. MSANK issued a Notice of Violation dated April 2, 2014 (attached). MSANK issued an enforcement decision letter dated May 20, 2014 (attached).

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Facility Identification #PA0027411

CWA- Field Audit

Attachment # 7 of 16

2014 PRETREATMENT FINE STATUS REPORT

Industrial User	Date of Violation	Type of Violation	Amount of Penalty	Penalty Issuance Date	Date Penalty Paid by Industrial User
Keystone Rustproofing	Dec. 20-21, 2011	Zinc, Total Metals	$25,000.00	4/15/2013	$25,000 has been mitigated on 7/17/14 for upgrade costs.
	Jan. 31, 2012	Total Cyanide			
	Sep. 27-28, 2012	Nickel, Zinc			
	Nov. 14-15, 2012	Nickel, Zinc			
Keystone Rustproofing	July 30-31, 2013	Nickel	$3,000.00	1/20/2014	$3,000 has been mitigated on 7/17/14 for upgrade costs.
Keystone Rustproofing	Sep. 29-30, 2013	Nickel	$33,000.00	7/21/2014	$33,000 will be mitigated upon proof of equal system upgrade costs
	Feb. 11-12, 2014	Nickel, Zinc			
Schreiber Industrial Development Company	2nd Quarter 2014	Zinc	$2,000.00	9/15/2014	
Keystone Rustproofing	June 25-26, 2014	Zinc	$11,000.00	10/20/2014	$11,000 will be mitigated upon proof of equal system upgrade costs
Schreiber Industrial Development Company	Third Quarter 2014 Oct. 2-3, 2014	CBOD, Zinc (SNC) CBOD, Zinc (SNC), Oil and Grease	$11,000.00	12/15/2014	
Keystone Rustproofing	July 29-30, 2014	Nickel	$6,000.00	1/19/2015	$6,000 will be mitigated upon proof of equal system upgrade costs

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Attachment # 8 of 16

THE MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

120 Logans Ferry Road, New Kensington, PA. 15068-2046
Phone (724) 335-9813 - Fax (724) 335-8289

NOTICE OF VIOLATION

IN THE MATTER OF	*	**NOTICE OF VIOLATION**
	*	**ISSUANCE DATE:**
KEYSTONE RUSTPROOFING, INC.	*	
1901 Dr. Thomas Blvd.	*	**January 21, 2015**
Arnold, PA 15068	*	

LEGAL AUTHORITY

The following findings are made and notice issued pursuant to the authority vested in the Municipal Sanitary Authority of the City of New Kensington, under Section 5 of the Municipal Sanitary Authority of the City of New Kensington's Industrial Pretreatment Resolution of April 5, 1994 (Pretreatment Resolution) governing users of the Authority's Publicly Owned Treatment Works. This notice is based on findings of violation of the conditions of the wastewater discharge permit issued under Section 4 of the Municipal Sanitary Authority of the City of New Kensington's Pretreatment Resolution.

FINDINGS

1. The Municipal Sanitary Authority of the City of New Kensington is charged with construction, maintenance, and control of the sewer system and treatment works.

2. To protect the sewer system and treatment works, the Municipal Sanitary Authority of the City of New Kensington administers a pretreatment program.

3. Under this pretreatment program Keystone Rustproofing was issued a discharge permit, Pretreatment Discharge Permit No. SMJ-000040.

4. The discharge permit issued to Keystone Rustproofing contained numerical limits on the concentrations of pollutants, which Keystone Rustproofing could discharge and self-monitoring requirements.

5. The Municipal Sanitary Authority conducted a wastewater sample event on December 16-17, 2014 at the discharge of the Keystone Rustproofing, Inc. pretreatment system. Analytical results from this wastewater sampling event reported exceedences of permit limits as indicated below:

Pollutant:	Analytical Results	Permit Limit	SNC Limit
Nickel	0.410 mg/l	0.220 mg/l (Max)	0.260 mg/l
Zinc	2.000 mg/l	1.990 mg/l (Max)	
Zinc	2.000 mg/l	1.690 mg/l (Avg)	

NOTICE OF VIOLATION

NOTICE

THEREFORE, BASED ON THE ABOVE FINDINGS KEYSTONE RUSTPROOFING, INC. IS HEREBY NOTIFIED THAT:

1. It is in violation of its discharge permit and the Pretreatment Resolution of the Municipal Sanitary Authority of the City of New Kensington.

2. Within Thirty (30) days following receipt of this Notice of Violation, Keystone Rustproofing, Inc. shall submit an explanation of the causes of the violations and a description of the steps taken to correct the violations and ensure that the violations do not recur to the Municipal Sanitary Authority of the City of New Kensington. Where the violations cannot be corrected within the thirty (30) day period, Keystone Rustproofing, Inc. shall indicate the reason for this delay in the description provided. Failure to submit an explanation to the Municipal Sanitary Authority of the City of New Kensington within thirty days following receipt of this Notice of Violation may result in further enforcement action by the Municipal Sanitary Authority of the City of New Kensington.

Signed: Joseph F. Ditty

Joseph Ditty
Pretreatment Coordinator
Municipal Sanitary Authority of the
City of New Kensington
120 Logans Ferry Road
New Kensington, PA 15068

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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CWA- Field Audit

Attachment # 9 of 16

MUNICIPAL SANITARY AUTHORITY
The City of New Kensington, Pa.
KEYSTONE 2012 EFFLUENT

Parameter	EPA Limit Daily Max	EPA Limit Month Avg.	KEYSTONE 1/30/2012	KEYSTONE 3/30/2012	KEYSTONE 5/31/2012	KEYSTONE 7/31/2012
pH	6.0-11.5 su	--	8.5 su	9.1 su	8.8 su	9.7 su
Cadmium	0.200 mg/l	0.360 mg/l	<0.050 mg/l	<0.005 mg/l	<0.005 mg/l	<0.005 mg/l
Chromium	5.580 mg/l	2.230 mg/l	0.080 mg/l	0.062 mg/l	0.091 mg/l	0.052 mg/l
Silver	0.560 mg/l	0.310 mg/l	<0.050 mg/l	0.036 mg/l	0.030 mg/l	0.037 mg/l
Lead	0.600 mg/l	0.340 mg/l	<0.050 mg/l	<0.005 mg/l	<0.005 mg/l	<0.005 mg/l
Copper	1.400 mg/l	1.890 mg/l	0.120 mg/l	0.044 mg/l	0.054 mg/l	0.018 mg/l
Zinc	3.000 mg/l	1.690 mg/l	1.140 mg/l	0.213 mg/l	0.279 mg/l	0.178 mg/l
Nickel	0.720 mg/l	1.990 mg/l	0.630 mg/l	0.013 mg/l	0.271 mg/l	0.034 mg/l
Total Metals	10.500 mg/l	5.000 mg/l	1.970 mg/l	0.332 mg/l	0.695 mg/l	0.282 mg/l
Cyanide	0.150 mg/l	0.530 mg/l	**0.363 mg/l**	<0.010 mg/l	<0.010 mg/l	<0.010 mg/l
**TTO	2.130 mg/l	--	--	--	--	--

Parameter	EPA Limit Daily Max	EPA Limit Month Avg.	*MSANK 8/30-31/12	KEYSTONE 9/28/2012	*MSANK 11/14-15/12	KEYSTONE 11/30/2012
pH	6.0-11.5 su	--	10.2, 9.7 su	9.9 su	10.5,10.9 su	9.7 su
Cadmium	0.200 mg/l	0.360 mg/l	<0.003 mg/l	<0.005 mg/l	0.005 mg/l	<0.005 mg/l
Chromium	5.580 mg/l	2.230 mg/l	0.599 mg/l	0.437 mg/l	0.723 mg/l	0.149 mg/l
Silver	0.560 mg/l	0.310 mg/l	<0.006 mg/l	0.096 mg/l	0.012 mg/l	0.048 mg/l
Lead	0.600 mg/l	0.340 mg/l	<0.005 mg/l	<0.005 mg/l	0.008 mg/l	<0.005 mg/l
Copper	1.400 mg/l	1.890 mg/l	0.039 mg/l	0.504 mg/l	0.266 mg/l	0.047 mg/l
Zinc	3.000 mg/l	1.690 mg/l	1.310 mg/l	**1.780 mg/l**	**3.430 mg/l**	0.282 mg/l
Nickel	0.720 mg/l	1.990 mg/l	0.203 mg/l	**1.080 mg/l**	**1.000 mg/l**	0.027 mg/l
Total Metals	10.500 mg/l	5.000 mg/l	2.151 mg/l	3.801 mg/l	**5.419 mg/l**	0.505 mg/l
Cyanide	0.150 mg/l	0.530 mg/l	0.034 mg/l	0.061 mg/l	0.097 mg/l	<0.010 mg/l
**TTO	2.130 mg/l	--	--	--	--	--

LEGEND:	*averaged CN	<: non-detect	--: no test	Out of Limits	SNC
#sampler problem		**TTO in the permit is a limit with no test requirement			

MUNICIPAL SANITARY AUTHORITY
The City of New Kensington, Pa.
KEYSTONE 2013 EFFLUENT

Parameter	EPA Limit Daily Max	EPA Limit Month Avg.	KEYSTONE 1/31/2013	KEYSTONE 3/15/2013	KEYSTONE 5/16/2013	*MSANK 6/27-28/13
pH	6.0-11.5 su	--	9.5 su	9.5 su	8.7 su	10.0, 10.1 su
Cadmium	0.110 mg/l	0.360 mg/l	<0.005 mg/l	<0.005 mg/l	<0.005 mg/l	0.002 mg/l
Chromium	5.580 mg/l	2.230 mg/l	0.590 mg/l	0.036 mg/l	0.140 mg/l	0.120 mg/l
Silver	0.560 mg/l	0.310 mg/l	0.019 mg/l	0.070 mg/l	0.006 mg/l	0.012 mg/l
Lead	0.170 mg/l	0.340 mg/l	<0.010 mg/l	<0.010 mg/l	0.011 mg/l	0.001 mg/l
Copper	0.690 mg/l	1.890 mg/l	0.067 mg/l	0.189 mg/l	0.050 mg/l	0.061 mg/l
Zinc	1.990 mg/l	1.690 mg/l	0.538 mg/l	0.201 mg/l	0.198 mg/l	0.430 mg/l
Nickel	0.220 mg/l	1.990 mg/l	0.052 mg/l	0.086 mg/l	0.060 mg/l	0.027 mg/l
Total Metals	10.500 mg/l	5.000 mg/l	0.657 mg/l	0.512 mg/l	0.448 mg/l	0.630 mg/l
Cyanide	0.120 mg/l	0.530 mg/l	0.022 mg/l	<0.005 mg/l	0.039 mg/l	0.021 mg/l
**TTO	2.130 mg/l	--	--	--	--	--

Parameter	EPA Limit Daily Max	EPA Limit Month Avg.	KEYSTONE 7/31/2013	KEYSTONE 9/30/2013	KEYSTONE 11/27/2013	*MSANK 12/11-12/13
pH	6.0-11.5 su	--	9.4	9.5	9.1	9.6
Cadmium	0.110 mg/l	0.360 mg/l	<0.005 mg/l	<0.005 mg/l	<0.005 mg/l	0.160 mg/l
Chromium	5.580 mg/l	2.230 mg/l	0.249 mg/l	0.029 mg/l	0.092 mg/l	1.800 mg/l
Silver	0.560 mg/l	0.310 mg/l	0.024 mg/l	<0.005 mg/l	0.016 mg/l	0.059 mg/l
Lead	0.170 mg/l	0.340 mg/l	<0.010 mg/l	<0.010 mg/l	<0.010 mg/l	0.057 mg/l
Copper	0.690 mg/l	1.890 mg/l	0.147 mg/l	0.049 mg/l	0.045 mg/l	**2.100 mg/l**
Zinc	1.990 mg/l	1.690 mg/l	0.687 mg/l	0.313 mg/l	0.476 mg/l	**17.000 mg/l**
Nickel	0.220 mg/l	1.990 mg/l	**1.120 mg/l**	**0.268 mg/l**	0.038 mg/l	**1.100 mg/l**
Total Metals	10.500 mg/l	5.000 mg/l	2.203 mg/l	0.659 mg/l	0.651 mg/l	**22.000 mg/l**
Cyanide	0.120 mg/l	0.530 mg/l	<0.005 mg/l	<0.005 mg/l	<0.005 mg/l	0.049 mg/l
**TTO	2.130 mg/l	--	--	--	--	--

LEGEND:	*averaged CN	<: non-detect	--: no test	Out of Limits
**TTO in the permit is a limit with no test requirement				

MUNICIPAL SANITARY AUTHORITY
The City of New Kensington, Pa.
KEYSTONE 2014 EFFLUENT

Parameter	EPA Limit Daily Max	EPA Limit Month Avg.	KEYSTONE 1/31/2014	MSANK 2/28/2014	KEYSTONE 3/28/2014	MSANK 4/29-30/14	KEYSTONE 5/30/2014	MSANK 6/25-26/14
pH	6.0-11.5 su	--	9.2 su	--	9.0 su	--	9.4 su	10.9, 11.2 su
Cadmium	0.110 mg/l	0.360 mg/l	<0.005 mg/l	--	<0.005 mg/l	0.006 mg/l	<0.005 mg/l	0.005 mg/l
Chromium	5.580 mg/l	2.230 mg/l	0.086 mg/l	--	0.063 mg/l	0.690 mg/l	0.032 mg/l	0.330 mg/l
Silver	0.560 mg/l	0.310 mg/l	0.011 mg/l	--	0.006 mg/l	0.039 mg/l	0.005 mg/l	0.024 mg/l
Lead	0.170 mg/l	0.340 mg/l	<0.010 mg/l	--	<0.010 mg/l	0.001 mg/l	<0.010 mg/l	0.003 mg/l
Copper	0.690 mg/l	1.890 mg/l	0.091 mg/l	0.285 mg/l	0.031 mg/l	0.180 mg/l	0.106 mg/l	0.170 mg/l
Zinc	1.990 mg/l	1.690 mg/l	0.377 mg/l	**2.600 mg/l**	0.415 mg/l	0.650 mg/l	0.484 mg/l	**2.900 mg/l**
Nickel	0.220 mg/l	1.990 mg/l	0.014 mg/l	**0.620 mg/l**	0.179 mg/l	0.095 mg/l	0.085 mg/l	0.095 mg/l
Total Metals	10.500 mg/l	5.000 mg/l	0.568 mg/l	--	0.656 mg/l	1.615 mg/l	0.707 mg/l	1.615 mg/l
*T. Cyanide	0.120 mg/l	0.530 mg/l	<0.005 mg/l	<0.010 mg/l	<0.005 mg/l	0.084 mg/l	<0.005 mg/l	0.084 mg/l
**TTO	2.130 mg/l	--	--	--	--	--	--	--

Parameter	EPA Limit Daily Max	EPA Limit Month Avg.	KEYSTONE 7/30/2014	MSANK 9/24-25/14	KEYSTONE 9/30/2014	KEYSTONE 11/26/2014	MSANK 12/16-17/14
pH	6.0-11.5 su	--	6.8 su	10.3, 10.4 su	9.8 su	9.6 su	10.0 su
Cadmium	0.110 mg/l	0.360 mg/l	0.0038 mg/l	0.001 mg/l	<0.005 mg/l	<0.005 mg/l	0.0023 mg/l
Chromium	5.580 mg/l	2.230 mg/l	0.050 mg/l	0.240 mg/l	0.259 mg/l	0.149 mg/l	0.240 mg/l
Silver	0.560 mg/l	0.310 mg/l	0.014 mg/l	0.028 mg/l	0.019 mg/l	0.012 mg/l	0.0038 mg/l
Lead	0.170 mg/l	0.340 mg/l	<0.010 mg/l	0.0008 mg/l	<0.010 mg/l	<0.005 mg/l	0.0048 mg/l
Copper	0.690 mg/l	1.890 mg/l	0.061 mg/l	0.062 mg/l	0.047 mg/l	0.041 mg/l	0.082 mg/l
Zinc	1.990 mg/l	1.690 mg/l	1.060 mg/l	0.170 mg/l	0.465 mg/l	0.246 mg/l	**2.000 mg/l**
Nickel	0.220 mg/l	1.990 mg/l	**1.950 mg/l**	0.027 mg/l	0.024 mg/l	0.030 mg/l	**0.410 mg/l**
Total Metals	10.500 mg/l	5.000 mg/l	3.121 mg/l	0.499 mg/l	0.795 mg/l	1.807 mg/l	0.499 mg/l
* T. Cyanide	0.120 mg/l	0.530 mg/l	<0.005 mg/l	0.037 mg/l	<0.005 mg/l	0.010 mg/l	0.037 mg/l
**TTO	2.130 mg/l	--	--	--	--	--	--

LEGEND:	*averaged	<: non-detect	--: no test	Out of Limits	SNC
#sampler problem		**TTO in the permit is a limit with no test requirement			

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
FACILITY INSPECTION PROGRAM
Wheeling Operations Office
1060 Chapline Street
Wheeling, West Virginia 26003-2995
(304) 234-0263

New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068

Facility Identification #PA0027411

CWA- Field Audit

Attachment # 10 of 16

Section 2.0

MUNICIPAL SANITARY AUTHORITY

OF THE CITY OF NEW KENSINGTON

INDUSTRIAL USER – PRETREATMENT PERMIT

PERMIT NO. SMJ-000070

PERMITTEE : UNIFIRST CORPORATION
MAILING ADDRESS : 1150 SECOND AVENUE
NEW KENSINGTON, PA 15068

FACILITY ADDRESS : SAME

DESIGNATED FACILITY CONTACT PERSON: MR. JAMES R. LANG

STANDARD INDUSTRIAL CLASSIFICATION (SIC) : 7218

CATEGORY: SIGNIFICANT-MAJOR

MSANK USER NUMBER : 000070

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

DISCHARGE PARAMETER	DISCHARGE LIMIT – mg/l		REPORT AND MEASUREMENT FREQUENCY	SAMPLE TYPE
	Surcharge Limit (a)	Fine Limit (b)		
pH	----	6.0-11.5 S.U.	WEEKLY	GRAB (c)
OIL & GREASE	100 mg/l	500 mg/l	WEEKLY	GRAB (c)
TSS	275 mg/l	771 mg/l	WEEKLY	24 HR. F.P. COMP.
CADMIUM (T)	----	0.11 mg/l	MONTHLY	24 HR. F.P. COMP.
CHROMIUM (T)	----	12.2 mg/l	MONTHLY	24 HR. F.P. COMP.
LEAD	----	0.17 mg/l	MONTHLY	24 HR. F.P. COMP.
NICKEL (T)	----	0.22 mg/l	MONTHLY	24 HR. F.P. COMP.
COPPER (T)	----	0.69 mg/l	MONTHLY	24 HR. F.P. COMP.
ZINC (T)	----	1.99 mg/l	MONTHLY	24 HR. F.P. COMP.
CBOD5	300 mg/l	729 mg/l	WEEKLY	24 HR. F.P. COMP.
FLOW	----	----	*CONTINUOUS	*CONTINUOUS
TEMPERATURE	----	150 DEGREES F	WEEKLY	GRAB (c)
pH	----	6.0-11.5 S.U.	*CONTINUOUS	*CONTINUOUS
AMMONIA	20 mg/l	--	--	24-HR. COMP.
PHOSPHORUS	10 mg/l	--	--	24-HR. COMP.
TOTAL CYANDIE	--	0.12 mg/l	--	GRAB (c)
HEX. CHROMIUM	--	2.3 mg/l	--	24-HR. COMP.
MERCURY	--	0.016 mg/l	--	24-HR. COMP
ARSENIC	--	0.110 mg/l	--	24-HR. COMP.
SILVER	--	0.56 mg/l	--	24-HR. COMP.
TOTAL PHENOLS	--	1.0 mg/l	--	GRAB (c)
SELENIUM	--	14.1 mg/l	--	24-HR. COMP.

REPORTING FREQUENCY: **MONTHLY**

SAMPLING LOCATION: FLOW METER FLUME BEFORE LAST MANHOLE DOWNSTREAM FROM TREATMENT DEVICES, NEAR REAR ENTRANCE TO WASTE WATER TREATMENT ROOM.

(a) THE DISCHARGE MAY EXCEED THE SURCHARGE LIMIT, BUT A SURCHARGE WILL BE ASSESSED ANYTIME THE PARAMETER EXCEEDS THE SURCHARGE LIMIT.

(b) NO DISCHARGE MAY EXCEED THE FINE LIMIT, AND ALL SUCH VIOLATIONS ARE SUBJECT TO ENFORCEMENT. A FINE WILL BE ASSESSED ANYTIME THE PARAMETER EXCEEDS THE FINE LIMIT.

(c) GRAB SAMPLES TO BE TAKEN FOUR (4) TIMES OVER THE 24-HOUR DISCHARGE PERIOD. ON-SITE TESTING IS REQUIRED FOR SHORT HOLD PARAMETERS (pH, TEMPERATURE).

SAMPLES FOR CBOD, TOTAL SUSPENDED SOLIDS, OIL AND GREASE, PH AND TEMPERATURE ARE TO BE DONE ON A MONDAY THROUGH FRIDAY ROTATION THROUGH THE YEAR.

FLOW PROPORTIONAL SAMPLING IS TO BE DONE FOR COMPOSITE SAMPLING.

*24 HOUR FLOW METER AND PH METER. THE PERMITTEE SHALL CLEAN, CALIBRATE, AND MAINTAIN THE FLOW METER AND PH METER TO ASSURE ACCURATE READINGS AT ALL TIMES. RECORDS OF METER CALIBRATION SHALL BE SUBMITTED TO THE CONTROL AUTHORITY, UPON REQUEST.

THE PERMITTEE SHALL MAINTAIN THE PH OF SUCH WASTEWATER WITHIN THE RANGE SET FORTH IN THE APPLICABLE PRETREATMENT PERMIT, EXCEPT EXCURSIONS FROM THE RANGE ARE PERMITTED SUBJECT TO THE FOLLOWING LIMITATIONS:

1) THE TOTAL TIME DURING WHICH THE PH VALUES ARE OUTSIDE OF THE REQUIRED RANGE OF PH VALUES SHALL NOT EXCEED 7 HOURS AND 26 MINUTES IN ANY CALENDAR MONTH, AND

2) NO INDIVIDUAL EXCURSION FROM THE RANGE OF PH VALUES SHALL EXCEED 60 MINUTES.

THIS SHORT-TERM EXCEEDANCE EXEMPTION DOES NOT ALLOW FOR ANY DISCHARGES BELOW PH 5.0 S.U. FOR ANY PERIOD OF TIME, SINCE THIS IS A NATIONAL PROHIBITION ON PH DISCHARGES.

THIS SHORT-TERM EXCEEDANCE EXEMPTION DOES NOT ALLOW FOR ANY DISCHARGES EQUAL TO, OR ABOVE PH 12.5 S.U. FOR ANY PERIOD OF TIME.

FOR PURPOSES OF THIS SECTION, AN EXCURSION IS AN UNINTENTIONAL AND TEMPORARY INCIDENT IN WHICH THE PH VALUE OF DISCHARGE WASTEWATER EXCEEDS THE RANGE SET FORTH IN THE APPLICABLE PRETREATMENT PERMIT.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
FACILITY INSPECTION PROGRAM
Wheeling Operations Office
1060 Chapline Street
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New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068

Facility Identification #PA0027411

CWA- Field Audit

Attachment # 11 of 16

MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

PRETREATMENT PROGRAM
FACILITY INSPECTION REPORT

GENERAL INFORMATION

Inspection Date: 11/21/13

Inspection Time: 10:00AM - 11:00AM

New: _____ Review: X

Samples Collected: ( ) Yes (X) No

Type of Sample Collected: ( ) Grab ( ) Composite NA Hours

Was Sample Split with Industrial User: ( ) Yes ( ) No

Sampling Location: NA

Inspection Conducted by:
(1) Joseph F. Ditty (2) _____
(3) _____ (4) _____

Facility Name: Unifirst Corporation

Facility Address: 1150 Second Avenue
New Kensington, PA 15068

Facility Location: Same as above

Telephone Number: 724-339-1077

Facility Contact Person:	James Lang	Kevin Stover	Steve Potka
Title:	General Manager	Plant Manager	Maintenance Manag
Telephone Number:	724-339-1077	724-339-1077	724-339-1077

Treatment Plant Operator: NA
Telephone Number: _____

Type of Industry: Uniform, rental cleaning, rugs and shop towels are also cleaned. Services - Personnel services.

SIC Code(s): 7218 _____ _____ _____

PRETREATMENT PROGRAM
FACILITY INSPECTION REPORT

Principal Products Produced or Services Rendered: Sales and Rentals of uniforms, rugs and shop towels, and the rentals are cleaned on-site.

Facility categorization: ( ) Categorical (X) Non-Categorical

Applicable Category: _____

If the Facility is considered to be a Categorical Industrial User: NA

Has a Solvent Management Plan (SMP) been submitted or has appropriate Total Toxic Organic (TTO) testing been conducted? ( ) Yes ( ) No
Are changes necessary in the submitted SMP? ( ) Yes ( ) No

Has a Baseline Monitoring Report (BMR) been submitted? ( ) Yes ( )
Are changes necessary in the submitted BMR? ( ) Yes ( )

Has a 90-Day Compliance Report (CR) been submitted? ( ) Yes ( )
Are changes necessary in the submitted CR? ( ) Yes ( )

Has a Preparedness, Prevention and Contingency Plan (PPC Plan) been submitted? (X) Yes ( ) No
Are changes necessary in the submitted PPC Plan? ( ) Yes (X) No

Has a Chemical List been submitted? (X) Yes ( ) No
Are changes necessary in the Chemical List? (X) Yes ( ) No

Total Number of Employees: 175
Number of Shifts per Work Day: Two shifts (5:00AM-1:30PM, 12:00PM-5:30PM)
Number of Employees per Shift: First shift: (150) ; Second shift (25)

Production Process is: ( ) Batch ( ) Continuous ( ) Intermittent

Frequency of Production: Monday (4:00AM) - Friday (9:00PM)

Total Operational Hours for Facility: Same as Production

Total Hours per Day that Wastewater is Discharged: 16 Hours/Day
Time of Discharge: 4:00 AM - 9:00 PM

Peak Hourly Flow Rate: 15,000 GPM
Maximum Daily Flow Rate: _____
Average Daily Flow Rate: _____

PRETREATMENT PROGRAM
FACILITY INSPECTION REPORT

Average Wastewater Production

WASTEWATER PRODUCED	AVERAGE WASTEWATER PRODUCTION (GPD)	ESTIMATED (E) OR MEASURED (M)
Domestic Wastewater	7800	M
Non-Contact Cooling Water	—	—
Contact Cooling Water	—	—
Boiler/Tower Blowdown	3000	E
Stormwater Runoff to Sewer	—	—
Process Wastewater	71,800	M
Equipment/Facility Washdown	1600	E
Air Pollution Control Unit	—	—
Other (Describe)	5000	E
TOTAL WASTEWATER PRODUCTION	88,000	

Production Area has been Inspected: (X) Yes ( ) No

Describe Production Process: laundry cleaning of uniforms, rug and shop towels. Automated lines are operated by employ

Sketch of Production Process has been Provided: (X) Yes ( ) No

Raw Material Storage Area has been Inspected: (X) Yes ( ) No

Comments: Inspected raw materials storage areas (see attached list).

Spill Prevention/Control Processes have been Reviewed: (X) Yes ( ) No

Comments: The three 2000 gallon tanks have self-containmen walls in place. Any spills are drained into collection pits through floor drains.

Does the Facility have Floor Drains in the Manufacturing or Raw Material Storage Areas? (X) Yes ( ) No

If Yes, where do they discharge to? The collection pits have overfl that can go to the sanitary system, the garage floor drains are collected and hauled away.

Could an Accidental Spill lead to a Discharge to:

( ) An On-Site Disposal System
(X) Public Sewer System (e.g. Through Floor Drain)
( ) Storm Sewer
( ) Ground
( ) Other: _____

( ) Not Applicable - No possible discharge to any of the above routes.

Does the Facility have an Accidental Spill Prevention Plan (ASPP) to prevent spills of chemicals or slug discharges from entering the public sewer system?

(X) Yes If Yes, has a copy been Submitted? (X) Yes ( ) N
( ) No
( ) Not Applicable

PRETREATMENT INFORMATION

Describe Pretreatment Process: DAF: Rug and shop towels wastewate rag soak: pH neutralization in two tanks clay: added to DAF units for separati

List Pretreatment Processes Used:
1. DAF units: Rugs & Carpets → DAF → pH Eq Tank → sewer.
2. pH equalization: laundry machines → pits → pH equalization tanks → sewer.
3. clay: DAF → pH Equalization tanks → sewer.

Sketch of Pretreatment Process has been Provided: (X) Yes ( ) No

Is any Pretreatment Unit Bypassed? ( ) Yes (X) No

If so, what unit(s) is bypassed and what is the reason for the bypass?

Compare the Influent Wastewater and Effluent Wastewater for: NA

PARAMETER	INFLUENT	EFFLUENT
Odor		
Color		
Clarity		
Floating Solids		
Pin Floc		
Oil & Grease		
Temperature		
pH		

If pH Recorder is used, check records for:
- (X) Calibration In house check against pH meters.
- ( ) Cleaning
- ( ) Spikes indicating Batch Discharge
- ( ) Not Applicable

If Flow Recorder is used, check accuracy. (X) Yes ( ) No ( ) N/A

What are the characteristics of the residuals (e.g. Sludge) generated from the Pretreatment Facility?

Quantity: 50 GPD (Micronics sludge plate press)

Moisture Content: _____

Type:

Biological	( ) Yes	(X) No
Inert	(X) Yes	( ) No
Toxic	( ) Yes	(X) No

How are pretreatment residuals currently disposed?
- ( ) Sanitary Sewer
- ( ) Storm Sewer
- ( ) Surface Water
- ( ) Ground Water
- (X) Haul to Landfill: DAF: AES (American Environmental Service)
- ( ) Hire Private Contractor: _____
- ( ) Evaporation
- ( ) Other: _____

Are chemicals used in the pretreatment process? (X) Yes ( ) No

List all chemicals used:

CHEMICAL	USE	FEED RATE
WSI 6104	Coagulant	480 ppm.
WSI 2121	Flocculant	22 ppm.
WSI clay	Coagulant	600 ppm.

Is all equipment properly calibrated? (X) Yes ( ) No

If No, Explain: _____

SAMPLING PROCEDURES NA

Is Sampling representative of normal production cycles? ( ) Yes ( ) No

Does the Facility maintain a Sampling Log? ( ) Yes ( ) No

Does the Facility maintain a Chain of Custody Record? ( ) Yes ( ) No

Is Analysis of Samples Performed: ( ) On-Site ( ) Contract Laboratory

Are all Samples analyzed in accordance with approved EPA Procedures?
( ) Yes ( ) No

If No, Explain: _____

COMMENTS/RECOMMENDATIONS

DAF is to be replaced in the near future (MSAN to be informed in advance).

Facility Inspection Form (continued)

Personnel Present During Inspection:
Joseph Dibby (MSANK), Kevin Stover (Onifirst,

Does the facility have a Slug Control Plan? (X) Yes ( ) No
If no, is a Slug Control Plan needed? ____

Are there any non-routine batch discharges that were not considered during the permitting process? ( ) Yes (X) No
If yes, describe the type, amount and frequency of the batch discharge:

Does the wastewater sampling point include all of the waste streams? ( ) Yes (X) No
If no, what waste streams are not included?
Domestic waste stream

Is the sampling equipment in good working order? (X) Yes ( ) No

Were the samples collected using the appropriate composite or grab sample collection method? (X) Yes ( ) No
If no, what method should have been used? ____

General housekeeping practices at the facility: (X) Good ( ) Fair ( ) Poor ( )
If poor, what corrections are needed? ____

Is hazardous waste generated at the facility? ( ) Yes (X) No
If yes, how is it disposed? ____

Were waste manifest forms for any materials sent off-site reviewed during the inspection? (X) Yes ( ) No
If no, why not?

Were self-monitoring report forms reviewed during the inspection? (X) Yes ( ) No
If no, why not? ____

Is wastewater ever hauled to another publicly owned treatment works (POTW) for treatment? ( ) Yes (X) No
If yes, describe the amount and frequency of wastewater hauled offsite:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
FACILITY INSPECTION PROGRAM
Wheeling Operations Office
1060 Chapline Street
Wheeling, West Virginia 26003-2995
(304) 234-0263

New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068

Facility Identification #PA0027411

CWA- Field Audit

Attachment # 12 of 16

MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

PRETREATMENT PROGRAM
FACILITY INSPECTION REPORT

GENERAL INFORMATION

Inspection Date: 12/8/14

Inspection Time: 10:00 AM

New: _____ Review: ✓

Samples Collected: ( ) Yes (X) No

Type of Sample Collected: ( ) Grab ( ) Composite NA Hours

Was Sample Split with Industrial User: ( ) Yes ( ) No

Sampling Location: NA

Inspection Conducted by:
(1) Joseph R. Dittig (2) _____
(3) _____ (4) _____

Facility Name: Unifirst Corporation

Facility Address: Second Avenue
New Kensington, PA 15068

Facility Location: _____

Telephone Number: 724-339-1077

Facility Contact Person: Larry Camilli | Steve Potoka
Title: Maintenance
Telephone Number: Same as above

Treatment Plant Operator: _____
Telephone Number: _____

Type of Industry: _____

SIC Code(s): 7218 _____ _____ _____

MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

PRETREATMENT PROGRAM
FACILITY INSPECTION REPORT

Principal Products Produced or Services Rendered: _____

Facility categorization: ( ) Categorical ( ) Non-Categorical

Applicable Category: _____

If the Facility is considered to be a Categorical Industrial User:

Has a Solvent Management Plan (SMP) been submitted or has appropriate Total Toxic Organic (TTO) testing been conducted? ( ) Yes ( ) No
Are changes necessary in the submitted SMP? ( ) Yes ( ) No

Has a Baseline Monitoring Report (BMR) been submitted? ( ) Yes ( ) No
Are changes necessary in the submitted BMR? ( ) Yes ( ) No

Has a 90-Day Compliance Report (CR) been submitted? ( ) Yes ( ) No
Are changes necessary in the submitted CR? ( ) Yes ( ) No

Has a Preparedness, Prevention and Contingency Plan (PPC Plan) been submitted? ( ) Yes ( ) No
Are changes necessary in the submitted PPC Plan? ( ) Yes ( ) No

Has a Chemical List been submitted? ( ) Yes ( ) No
Are changes necessary in the Chemical List? ( ) Yes ( ) No

Total Number of Employees: _____
Number of Shifts per Work Day: _____
Number of Employees per Shift: _____

Production Process is: ( ) Batch ( ) Continuous ( ) Intermittent

Frequency of Production: _____

Total Operational Hours for Facility: _____

Total Hours per Day that Wastewater is Discharged: _____
Time of Discharge: _____

Peak Hourly Flow Rate: _____
Maximum Daily Flow Rate: _____
Average Daily Flow Rate: _____

Average Wastewater Production

WASTEWATER PRODUCED	AVERAGE WASTEWATER PRODUCTION (GPD)	ESTIMATED (E) OR MEASURED (M)
Domestic Wastewater		
Non-Contact Cooling Water		
Contact Cooling Water		
Boiler/Tower Blowdown		
Stormwater Runoff to Sewer		
Process Wastewater		
Equipment/Facility Washdown		
Air Pollution Control Unit		
Other (Describe)		
TOTAL WASTEWATER PRODUCTION		

Production Area has been Inspected: ( ) Yes ( ) No

Describe Production Process: _____

Sketch of Production Process has been Provided: ( ) Yes ( ) No

Raw Material Storage Area has been Inspected: ( ) Yes ( ) No

Comments: _____

Spill Prevention/Control Processes have been Reviewed: ( ) Yes ( ) No

Comments: _____

Does the Facility have Floor Drains in the Manufacturing or Raw Material Storage Areas? ( ) Yes ( ) No

If Yes, where do they discharge to? _____

Could an Accidental Spill lead to a Discharge to:

( ) An On-Site Disposal System
( ) Public Sewer System (e.g. Through Floor Drain)
( ) Storm Sewer
( ) Ground
( ) Other: _____

( ) Not Applicable - No possible discharge to any of the above routes.

Does the Facility have an Accidental Spill Prevention Plan (ASPP) to prevent spills of chemicals or slug discharges from entering the public sewer system?

( ) Yes If Yes, has a copy been Submitted? ( ) Yes ( ) No
( ) No
( ) Not Applicable

PRETREATMENT INFORMATION

Describe Pretreatment Process: _____

List Pretreatment Processes Used: _____

Sketch of Pretreatment Process has been Provided: ( ) Yes ( ) No

Is any Pretreatment Unit Bypassed? ( ) Yes ( ) No

If so, what unit(s) is bypassed and what is the reason for the bypass?

Compare the Influent Wastewater and Effluent Wastewater for:

PARAMETER	INFLUENT	EFFLUENT
Odor		
Color		
Clarity		
Floating Solids		
Pin Floc		
Oil & Grease		
Temperature		
pH		

If pH Recorder is used, check records for:
( ) Calibration
( ) Cleaning
( ) Spikes indicating Batch Discharge
( ) Not Applicable

If Flow Recorder is used, check accuracy. ( ) Yes ( ) No ( ) N/A

What are the characteristics of the residuals (e.g. Sludge) generated from the Pretreatment Facility?

Quantity: _____

_____

Moisture Content: _____

_____

Type:
Biological ( ) Yes ( ) No
Inert ( ) Yes ( ) No
Toxic ( ) Yes ( ) No

How are pretreatment residuals currently disposed?
( ) Sanitary Sewer
( ) Storm Sewer
( ) Surface Water
( ) Ground Water
( ) Haul to Landfill: _____
( ) Hire Private Contractor: _____
( ) Evaporation
( ) Other: _____

Are chemicals used in the pretreatment process? ( ) Yes ( ) No

List all chemicals used:

CHEMICAL	USE	FEED RATE

Is all equipment properly calibrated? ( ) Yes ( ) No

If No, Explain: _____

SAMPLING PROCEDURES

Is Sampling representative of normal production cycles? ( ) Yes ( ) No

Does the Facility maintain a Sampling Log? ( ) Yes ( ) No

Does the Facility maintain a Chain of Custody Record? ( ) Yes ( ) No

Is Analysis of Samples Performed: ( ) On-Site ( ) Contract Laboratory

Are all Samples analyzed in accordance with approved EPA Procedures?
( ) Yes ( ) No

If No, Explain: _____

COMMENTS/RECOMMENDATIONS

Facility Inspection Form (continued)

Personnel Present During Inspection:

_____

_____

Does the facility have a Slug Control Plan? ( ) Yes ( ) No
If no, is a Slug Control Plan needed? _____

Are there any non-routine batch discharges that were not considered during the permitting process? ( ) Yes ( ) No
If yes, describe the type, amount and frequency of the batch discharge:

_____

_____

Does the wastewater sampling point include all of the waste streams? ( ) Yes ( ) No
If no, what waste streams are not included?

_____

_____

Is the sampling equipment in good working order? ( ) Yes ( ) No

Were the samples collected using the appropriate composite or grab sample collection method? ( ) Yes ( ) No
If no, what method should have been used? _____

General housekeeping practices at the facility: ( ) Good ( ) Fair ( ) Poor ( )
If poor, what corrections are needed? _____

Is hazardous waste generated at the facility? ( ) Yes ( ) No
If yes, how is it disposed? _____

Were waste manifest forms for any materials sent off-site reviewed during the inspection? ( ) Yes ( ) No
If no, why not?

_____

_____

Were self-monitoring report forms reviewed during the inspection? ( ) Yes ( ) No
If no, why not? _____

Is wastewater ever hauled to another publicly owned treatment works (POTW) for treatment? ( ) Yes ( ) No
If yes, describe the amount and frequency of wastewater hauled offsite:

_____

_____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
FACILITY INSPECTION PROGRAM
Wheeling Operations Office
1060 Chapline Street
Wheeling, West Virginia 26003-2995
(304) 234-0263

New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068

Facility Identification #PA0027411

CWA- Field Audit

Attachment # 13 of 16

MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

PRETREATMENT PROGRAM
FACILITY INSPECTION REPORT

GENERAL INFORMATION

Inspection Date: 11/22/13

Inspection Time: 10:00AM - 11:00AM

New: _____ Review: X

Samples Collected: ( ) Yes (X) No

Type of Sample Collected: ( ) Grab ( ) Composite NA Hours

Was Sample Split with Industrial User: ( ) Yes ( ) No

Sampling Location: _____

Inspection Conducted by:
(1) Joseph A. Kitty (2) _____
(3) _____ (4) _____

Facility Name: Keystone Rustproofing

Facility Address: 1901 Dr. Thomas Blvd.
Arnold, PA 15068

Facility Location: Same as above

Telephone Number: 724-339-7588

Facility Contact Person:	Larry Vogel	Paul Gansallo
Title:	Plant Manager	President
Telephone Number:	same as above	same as above

Treatment Plant Operator: Dan Wright, Jr. (Vice President)
Telephone Number: same as above

Type of Industry: Electroplating and Metal Finishing anodizing and metallic conversion coating. Combined waste stream formula limits in current permit.

SIC Code(s): ~~3471~~ 3471 _____ _____
(~~Electroplating~~) (~~Metal Finishing~~)
(Plating and Polishing)

MUNICIPAL SANITARY AUTHORITY OF THE CITY NEW KENSINGTON

PRETREATMENT PROGRAM
FACILITY INSPECTION REPORT

Principal Products Produced or Services Rendered: Electroplating and Metal Finishing of customers products,

Facility categorization: (X) Categorical ( ) Non-Categorical

Applicable Category: Electroplating / Metal Finishing

If the Facility is considered to be a Categorical Industrial User:

Has a Solvent Management Plan (SMP) been submitted or has appropriate Total Toxic Organic (TTO) testing been conducted? (X) Yes ( ) No
Are changes necessary in the submitted SMP? ( ) Yes (X) No

Has a Baseline Monitoring Report (BMR) been submitted? (X) Yes ( ) No
Are changes necessary in the submitted BMR? ( ) Yes (X) No

Has a 90-Day Compliance Report (CR) been submitted? (X) Yes ( ) No
Are changes necessary in the submitted CR? ( ) Yes (X) No

Has a Preparedness, Prevention and Contingency Plan (PPC Plan) been submitted? ( ) Yes ( ) No
Are changes necessary in the submitted PPC Plan? ( ) Yes ( ) No

Has a Chemical List been submitted? (X) Yes ( ) No
Are changes necessary in the Chemical List? ( ) Yes (X) No

Total Number of Employees: 49 (36 Factory / 10 Management / 3 office)
Number of Shifts per Work Day: 2 to 3 shifts
Number of Employees per Shift: 25 (First shift), 8 (factory (second) 4 (factory third shift) 1 office 3 (first shift)

Production Process is: (X) Batch ( ) Continuous ( ) Intermittent

Frequency of Production: 7:30 AM - 7:30 AM

Total Operational Hours for Facility: 18-24 Hours

Total Hours per Day that Wastewater is Discharged: 18-24 Hours
Time of Discharge: 7:30 AM - 7:30 AM

Peak Hourly Flow Rate: Undetermined
Maximum Daily Flow Rate: 20,000 GPD
Average Daily Flow Rate: 20,000 GPD

Average Wastewater Production

WASTEWATER PRODUCED	AVERAGE WASTEWATER PRODUCTION (GPD)	ESTIMATED (E) OR MEASURED (M)
Domestic Wastewater		
Non-Contact Cooling Water		
Contact Cooling Water		
Boiler/Tower Blowdown		
Stormwater Runoff to Sewer		
Process Wastewater		
Equipment/Facility Washdown		
Air Pollution Control Unit		
Other (Describe)		
TOTAL WASTEWATER PRODUCTION	25,000	

Production Area has been Inspected: (X) Yes ( ) No

Describe Production Process: Production area inspected. Production information list provided.

Sketch of Production Process has been Provided: (X) Yes ( ) No

Raw Material Storage Area has been Inspected: (X) Yes ( ) No

Comments: Reviewed new chemical list, checked chemicals in storage and work areas.

Spill Prevention/Control Processes have been Reviewed: ( ) Yes ( ) No

Comments: Spill prevention and control consists of absorbant material used for spills. Material records are on site.

Does the Facility have Floor Drains in the Manufacturing or Raw Material Storage Areas? ( ) Yes (X) No

If Yes, where do they discharge to? NA

Could an Accidental Spill lead to a Discharge to:

(X) An On-Site Disposal System
( ) Public Sewer System (e.g. Through Floor Drain)
( ) Storm Sewer
( ) Ground
(X) Other: containment pits and curbing in use,
( ) Not Applicable - No possible discharge to any of the above routes.

Does the Facility have an Accidental Spill Prevention Plan (ASPP) to prevent spills of chemicals or slug discharges from entering the public sewer system?

(X) Yes If Yes, has a copy been Submitted? ( ) Yes ( ) No
( ) No
( ) Not Applicable

PRETREATMENT INFORMATION

Describe Pretreatment Process: Three waste streams are treated for pollutant reduction, final clarifier with chemical addition to treat effluents before discharge. Additional screening of nickel waste stream to collect nickel and disposed of.

List Pretreatment Processes Used:
1. Cyanide Distruction (Appendix A)
2. Chemical Reduction (" ")
3. Acid / Alkaline
4. Nickel Screening (see photos)

Sketch of Pretreatment Process has been Provided: (X) Yes ( ) No

Is any Pretreatment Unit Bypassed? ( ) Yes (X) No

If so, what unit(s) is bypassed and what is the reason for the bypass?

MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

PRETREATMENT PROGRAM
FACILITY INSPECTION REPORT

Compare the Influent Wastewater and Effluent Wastewater for: NA

PARAMETER	INFLUENT	EFFLUENT
Odor		
Color		
Clarity		
Floating Solids		
Pin Floc		
Oil & Grease		
Temperature		
pH		

If pH Recorder is used, check records for:
- (X) Calibration
- (X) Cleaning
- ( ) Spikes indicating Batch Discharge
- ( ) Not Applicable

plt probes are cleaned every 24 hrs
plt probes are checked against another meter.

If Flow Recorder is used, check accuracy. (X) Yes ( ) No ( ) N/A

What are the characteristics of the residuals (e.g. Sludge) generated from the Pretreatment Facility?

Quantity: 6 cu.ft./day

Moisture Content: 75%

Type:
- Biological ( ) Yes (X) No
- Inert ( ) Yes (X) No
- Toxic (X) Yes ( ) No

How are pretreatment residuals currently disposed?
- ( ) Sanitary Sewer
- ( ) Storm Sewer
- ( ) Surface Water
- ( ) Ground Water
- ( ) Haul to Landfill:
- (X) Hire Private Contractor: Dart Trucking Co.; ASAP Technologies Tri-State Petroleum recovery Envirite chemtron
- ( ) Evaporation
- ( ) Other:

Are chemicals used in the pretreatment process? ( ) Yes ( ) No

List all chemicals used: (see chemical list)

CHEMICAL	USE	FEED RATE

Is all equipment properly calibrated? (X) Yes ( ) No

If No, Explain: _____

SAMPLING PROCEDURES

Is Sampling representative of normal production cycles? (X) Yes ( ) No

Does the Facility maintain a Sampling Log? (X) Yes ( ) No

Does the Facility maintain a Chain of Custody Record? (X) Yes ( ) No

Is Analysis of Samples Performed: (X) On-Site (X) Contract Laboratory

Are all Samples analyzed in accordance with approved EPA Procedures?
(X) Yes ( ) No

If No, Explain: _____

COMMENTS/RECOMMENDATIONS

Facility Inspection Form (continued)

Personnel Present During Inspection:
Joseph Ditty (MSANK), Larry Vogel (Keystone

Does the facility have a Slug Control Plan? ( ) Yes (X) No
If no, is a Slug Control Plan needed? No

Are there any non-routine batch discharges that were not considered during the permitting process? ( ) Yes (X) No
If yes, describe the type, amount and frequency of the batch discharge:

Does the wastewater sampling point include all of the waste streams? (X) Yes ( ) No
If no, what waste streams are not included?

Is the sampling equipment in good working order? (X) Yes ( ) No

Were the samples collected using the appropriate composite or grab sample collection method? (X) Yes ( ) No
If no, what method should have been used?

General housekeeping practices at the facility: ( ) Good (X) Fair ( ) Poor ( )
If poor, what corrections are needed?

Is hazardous waste generated at the facility? (X) Yes ( ) No
If yes, how is it disposed?

Were waste manifest forms for any materials sent off-site reviewed during the inspection? (X) Yes ( ) No
If no, why not?

Were self-monitoring report forms reviewed during the inspection? (X) Yes ( ) No
If no, why not?

Is wastewater ever hauled to another publicly owned treatment works (POTW) for treatment? (X) Yes ( ) No
If yes, describe the amount and frequency of wastewater hauled offsite:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
FACILITY INSPECTION PROGRAM
Wheeling Operations Office
1060 Chapline Street
Wheeling, West Virginia 26003-2995
(304) 234-0263

New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068

Facility Identification #PA0027411

CWA- Field Audit

Attachment # 14 of 16

MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

PRETREATMENT PROGRAM
FACILITY INSPECTION REPORT

GENERAL INFORMATION

Inspection Date: 12/16/14

Inspection Time: 9:30 AM - 10:45AM

New: _____ Review: X

Samples Collected: X Yes ( ) No

Type of Sample Collected: ( ) Grab ( ) Composite _____ Hours

Was Sample Split with Industrial User: ( ) Yes ( ) No

Sampling Location: _____

Inspection Conducted by:
(1) Joseph Ditty (2) _____
(3) _____ (4) _____

Facility Name: Keystone Rustproofing

Facility Address: _____

Facility Location: _____

Telephone Number: _____

Facility Contact Person: _____
Title: _____
Telephone Number: _____

Treatment Plant Operator: _____
Telephone Number: _____

Type of Industry: _____

SIC Code(s): _____ _____ _____ _____

MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

PRETREATMENT PROGRAM
FACILITY INSPECTION REPORT

Principal Products Produced or Services Rendered: _____

Facility categorization: ( ) Categorical ( ) Non-Categorical

Applicable Category: _____

If the Facility is considered to be a Categorical Industrial User:

Has a Solvent Management Plan (SMP) been submitted or has appropriate Total Toxic Organic (TTO) testing been conducted? ( ) Yes ( ) No
Are changes necessary in the submitted SMP? ( ) Yes ( ) No

Has a Baseline Monitoring Report (BMR) been submitted? ( ) Yes ( ) No
Are changes necessary in the submitted BMR? ( ) Yes ( ) No

Has a 90-Day Compliance Report (CR) been submitted? ( ) Yes ( ) No
Are changes necessary in the submitted CR? ( ) Yes ( ) No

Has a Preparedness, Prevention and Contingency Plan (PPC Plan) been submitted? ( ) Yes ( ) No
Are changes necessary in the submitted PPC Plan? ( ) Yes ( ) No

Has a Chemical List been submitted? ( ) Yes ( ) No
Are changes necessary in the Chemical List? ( ) Yes ( ) No

Total Number of Employees: _____
Number of Shifts per Work Day: _____
Number of Employees per Shift: _____

Production Process is: ( ) Batch ( ) Continuous ( ) Intermittent

Frequency of Production: _____

Total Operational Hours for Facility: _____

Total Hours per Day that Wastewater is Discharged: _____
Time of Discharge: _____

Peak Hourly Flow Rate: _____
Maximum Daily Flow Rate: _____
Average Daily Flow Rate: _____

MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

PRETREATMENT PROGRAM
FACILITY INSPECTION REPORT

Average Wastewater Production

WASTEWATER PRODUCED	AVERAGE WASTEWATER PRODUCTION (GPD)	ESTIMATED (E) OR MEASURED (M)
Domestic Wastewater		
Non-Contact Cooling Water		
Contact Cooling Water		
Boiler/Tower Blowdown		
Stormwater Runoff to Sewer		
Process Wastewater		
Equipment/Facility Washdown		
Air Pollution Control Unit		
Other (Describe)		
TOTAL WASTEWATER PRODUCTION		

Production Area has been Inspected: ( ) Yes ( ) No

Describe Production Process: _____

Sketch of Production Process has been Provided: ( ) Yes ( ) No

Raw Material Storage Area has been Inspected: ( ) Yes ( ) No

Comments: _____

Spill Prevention/Control Processes have been Reviewed: ( ) Yes ( ) No

Comments: _____

MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

PRETREATMENT PROGRAM
FACILITY INSPECTION REPORT

Does the Facility have Floor Drains in the Manufacturing or Raw Material Storage Areas? ( ) Yes ( ) No

If Yes, where do they discharge to? _____

Could an Accidental Spill lead to a Discharge to:

( ) An On-Site Disposal System
( ) Public Sewer System (e.g. Through Floor Drain)
( ) Storm Sewer
( ) Ground
( ) Other: _____

( ) Not Applicable - No possible discharge to any of the above routes.

Does the Facility have an Accidental Spill Prevention Plan (ASPP) to prevent spills of chemicals or slug discharges from entering the public sewer system?

( ) Yes If Yes, has a copy been Submitted? ( ) Yes ( ) No
( ) No
( ) Not Applicable

PRETREATMENT INFORMATION

Describe Pretreatment Process: _____

List Pretreatment Processes Used: _____

Sketch of Pretreatment Process has been Provided: ( ) Yes ( ) No

Is any Pretreatment Unit Bypassed? ( ) Yes ( ) No

If so, what unit(s) is bypassed and what is the reason for the bypass?

MUNICIPAL SANITARY AUTHORITY OF THE CITY OF NEW KENSINGTON

PRETREATMENT PROGRAM
FACILITY INSPECTION REPORT

Compare the Influent Wastewater and Effluent Wastewater for:

PARAMETER	INFLUENT	EFFLUENT
Odor		
Color		
Clarity		
Floating Solids		
Pin Floc		
Oil & Grease		
Temperature		
pH		

If pH Recorder is used, check records for:
( ) Calibration
( ) Cleaning
( ) Spikes indicating Batch Discharge
( ) Not Applicable

If Flow Recorder is used, check accuracy. ( ) Yes ( ) No ( ) N/A

What are the characteristics of the residuals (e.g. Sludge) generated from the Pretreatment Facility?

Quantity: _____

_____

Moisture Content: _____

Type: Biological ( ) Yes ( ) No
Inert ( ) Yes ( ) No
Toxic ( ) Yes ( ) No

How are pretreatment residuals currently disposed?
( ) Sanitary Sewer
( ) Storm Sewer
( ) Surface Water
( ) Ground Water
( ) Haul to Landfill: _____
( ) Hire Private Contractor: _____
( ) Evaporation
( ) Other: _____

Are chemicals used in the pretreatment process? ( ) Yes ( ) No

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
FACILITY INSPECTION PROGRAM
Wheeling Operations Office
1060 Chapline Street
Wheeling, West Virginia 26003-2995
(304) 234-0263

New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068

Facility Identification #PA0027411

CWA- Field Audit

Attachment # 15 of 16

MUNICIPAL SANITARY AUTHORITY
OF THE CITY OF NEW KENSINGTON, PA.

PRETREATMENT PROGRAM
FACILITY SAMPLE REPORT

START DATE 12/16/14 SAMPLING TIME: 10:45AM-11:30AM
DATE _____ SAMPLING TIME: _____
END DATE 12/17/14 SAMPLING TIME: 11:45AM-12:15PM
12/16/14 | 12/17/14

SAMPLE COLLECTED: (X) GRAB: HOURS: 11:03AM, 11:05AM
(X) COMPOSITE: 24 HOURS

WAS SAMPLE SPLIT WITH USER: ( ) YES (X) NO ( ) NA

SAMPLING LOCATION: Keystone sump pump discharge

SAMPLING CONDUCTED BY:

(1) Joseph F. Ditty (3) _____
(2) _____ (4) _____

FACILITY NAME: Keystone Rustproofing
FACILITY ADDRESS: 1901 Dr. Thomas Blvd.
Arnold, PA 15068

TELEPHONE NUMBER: 724-339-7588
FACILITY CONTACT PERSON: Larry Uggel
TITLE: Plant Manager

SAMPLING PROCEDURES

1. DOES SAMPLING REPRESENT NORMAL PRODUCTION: (X) YES ( ) NO

2. PRETREATMENT COMMENTS: _____

3. ANALYSIS IS PERFORMED AT: (X) MSANK LAB (X) CONTRACT LAB

4. SAMPLES ARE ANALYZED BY EPA METHODS (X) YES ( ) NO

5. COMMENTS: _____

MUNICIPAL SANITARY AUTHORITY
PRETREATMENT LABORATORY
DAILY LAB TEST INFORMATION

DATE: _____ OPERATOR: _____

1. PH METER: _____

_____

_____

_____

2. STANDARDS: _____

_____

_____

_____

3. OTHER: _____

_____

_____

_____

_____

_____

REFERENCE: STANDARD METHODS, 18TH EDITION.

MUNICIPAL SANITARY AUTHORITY
PRETREATMENT LABORATORY
DAILY LAB TEST INFORMATION

DATE: 12/17/14 **OPERATOR:** Joseph Ditty

1. **PH METER:** CL: 13AM) pH4: 4.00 | 21°C
pH7: 7.02 | 21°C
pH10: 10.05 | 21°C

2. **STANDARDS:** Used fresh pH buffers:
pH4: 07/2016
pH7: 07/2015
pH10: 09/2015

3. **OTHER:**

REFERENCE: STANDARD METHODS, 18TH EDITION.

MSANK PRETREATMENT LAB

pH Check of Sample Bottles

Sample Description: Keystone

Location	Date	Time	Bottle	Preservation	Final pH	pH First	pH Last	Analyst
			Oil & Grs.	H2SO4	<2			
			Oil & Grs.	H2SO4	<2			
			Oil & Grs.	H2SO4	<2			
			Metals	HNO3	<2			
			Metals	HNO3	<2			
			Metals	HNO3	<2			
			Cyanide	NAOH	>12			
			Cyanide	NAOH	>12			
			Cyanide	NAOH	>12			
			Phenols	H2SO4	<2			
			Phenols	H2SO4	<2			
			Phenols	H2SO4	<2			
			P, NH3	H2SO4	<2			
			P, NH3	H2SO4	<2			
			P, NH3	H2SO4	<2			
			TPH	HCL	<2			
			TPH	HCL	<2			
			TPH	HCL	<2			
Keystone	12/17/14	11:55AM	pH	--	--	9.95	9.95	J.A.D.
			pH	--	--			
			pH	--	--			

STANDARD METHODS, 18TH EDITION, METHOD 4500

Temperature Check of Sample Bottles

Location	Date	Time	Temp.	Analyst
Keystone	12/17/14	11:55AM	21.0°C	J.A.D.

STANDARD METHODS, 18TH EDITION, METHOD 2550

MSANK PRETREATMENT LAB

pH Check of Sample Bottles

Sample Description: _____

Location	Date	Time	Bottle	Preservation	Final pH	pH First	pH Last	Analyst
			Oil & Grs.	H2SO4	<2			
			Oil & Grs.	H2SO4	<2			
			Oil & Grs.	H2SO4	<2			
			Metals	HNO3	<2			
			Metals	HNO3	<2			
			Metals	HNO3	<2			
			Cyanide	NAOH	>12			
			Cyanide	NAOH	>12			
			Cyanide	NAOH	>12			
			Phenols	H2SO4	<2			
			Phenols	H2SO4	<2			
			Phenols	H2SO4	<2			
			P, NH3	H2SO4	<2			
			P, NH3	H2SO4	<2			
			P, NH3	H2SO4	<2			
			TPH	HCL	<2			
			TPH	HCL	<2			
			TPH	HCL	<2			
			pH	--	--			
			pH	--	--			
			pH	--	--			

STANDARD METHODS, 18TH EDITION, METHOD 4500

Temperature Check of Sample Bottles

Location	Date	Time	Temp.	Analyst

STANDARD METHODS, 18TH EDITION, METHOD 2550

LOCAL LIMIT BOTTLE REQUIREMENTS

PARAMETER	METHOD	BOTTLE TYPE	PRESERVATIVE	MINIMUM VOLUME	HOLDING TIME*
CBOD	405.1	Plastic	Cool 4 C	300 mL	48 hours
Total Suspended Solids	160.2	Plastic	Cool 4 C	100 mL	7 days
Total Cyanide	335.2	Plastic	Cool 4 C, NaOH to pH > 12	500 mL	14 days
Metals	200.7	Plastic	Cool 4 C, HNO3 to pH < 2	200 mL	180 days
Mercury	245.1	Plastic	Cool 4 C, HNO3 to pH < 2	200 mL	14 days
Hexavalent Chromium	307B	Plastic	Cool 4 C	100 mL	24 hours
Oil and Grease	413.1 1664A	Amber Glass	Cool 4 C, HCL or H2So4 to pH < 2	1000 mL	28 days
pH	150.1	Plastic	Cool 4 C	100 mL	Immediately
Total Phenols	420.1	Amber Glass with Teflon Lined Cap	Cool 4 C, H2So4 to pH < 2	100 mL	28 days
Temperature	170.1	Plastic	Cool 4 C	100 mL	Immediately
Ammonia	350.2	Plastic	Cool 4 C, H2So4 to pH < 2	100 mL	28 days
Phosphorous	365.1	Plastic	Cool 4 C, H2So4 to pH < 2	100 mL	28 days
Total Petroleum Hydrocarbons	418.1 1664A	Amber Glass	Cool 4 C, HCL to pH < 2	1000 mL	28 days

* Measured from the time of sample collection.

ENVIRONMENTAL PROTECTION AGENCY
Office of Enforcement

CHAIN OF CUSTODY RECORD

REGION 3
Curtis Bldg., 6th & Walnut Sts.
Philadelphia, Pennsylvania 19106

PROJ. NO. | PROJECT NAME: MSA New Kensington, PA Keystone Rustproofing

SAMPLERS: (Signature) Joseph A. Ditty

STA. NO.	DATE	TIME	COMP.	GRAB	STATION LOCATION	NO. OF CONTAINERS	pH	Temperature	REMARKS
	12/7/14	11:55AM		X	Keystone Effluent	NA	X	X	on-site Testing

Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received for Laboratory by: (Signature)	Date / Time	Remarks	

Distribution: Original Accompanies Shipment; Copy to Coordinator Field Files

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
FACILITY INSPECTION PROGRAM
Wheeling Operations Office
1060 Chapline Street
Wheeling, West Virginia 26003-2995
(304) 234-0263

New Kensington Municipal Sanitary Authority
120 Logans Ferry Road
New Kensington, PA 15068

Facility Identification #PA0027411

CWA- Field Audit

Attachment # 16 of 16

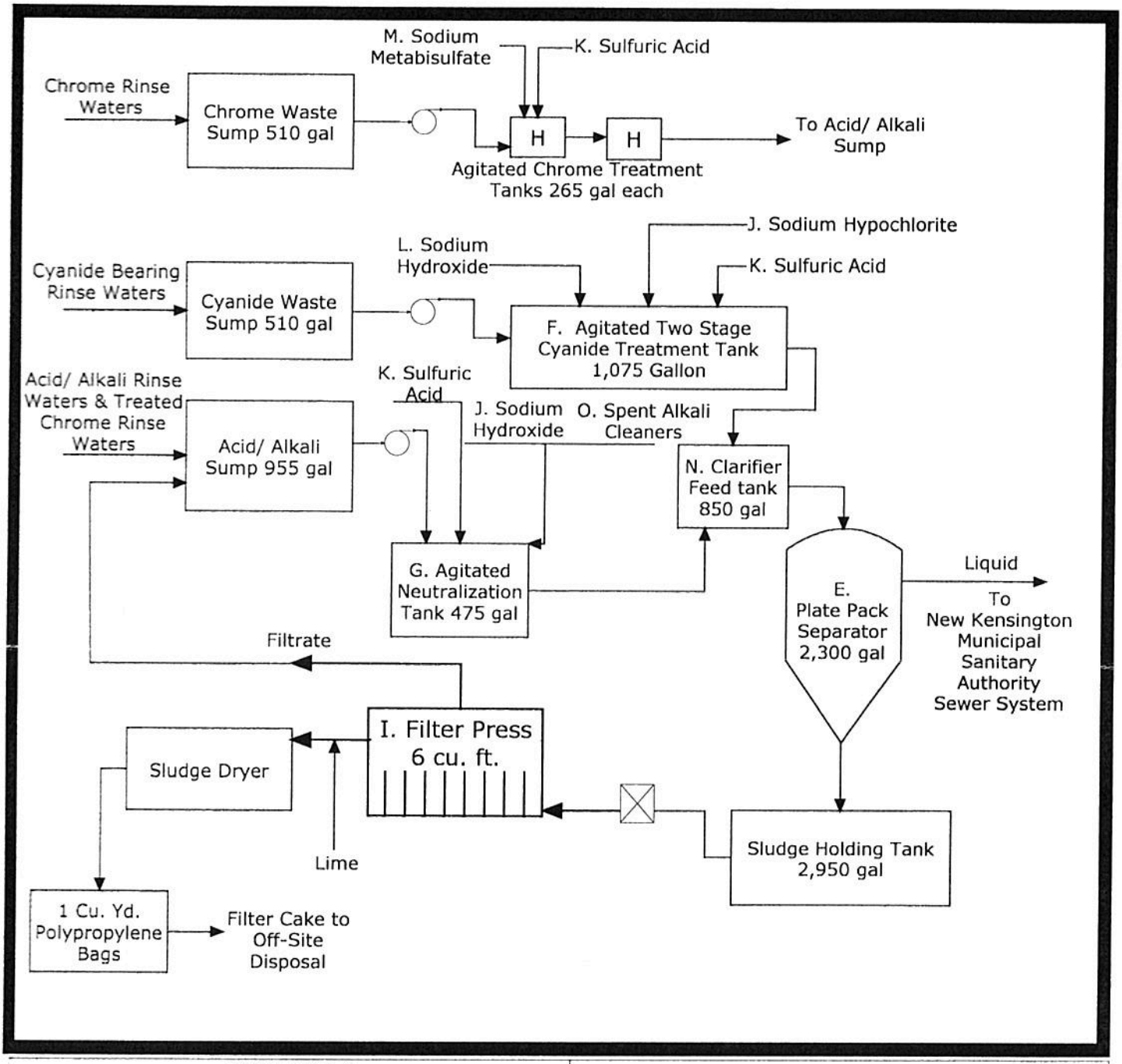


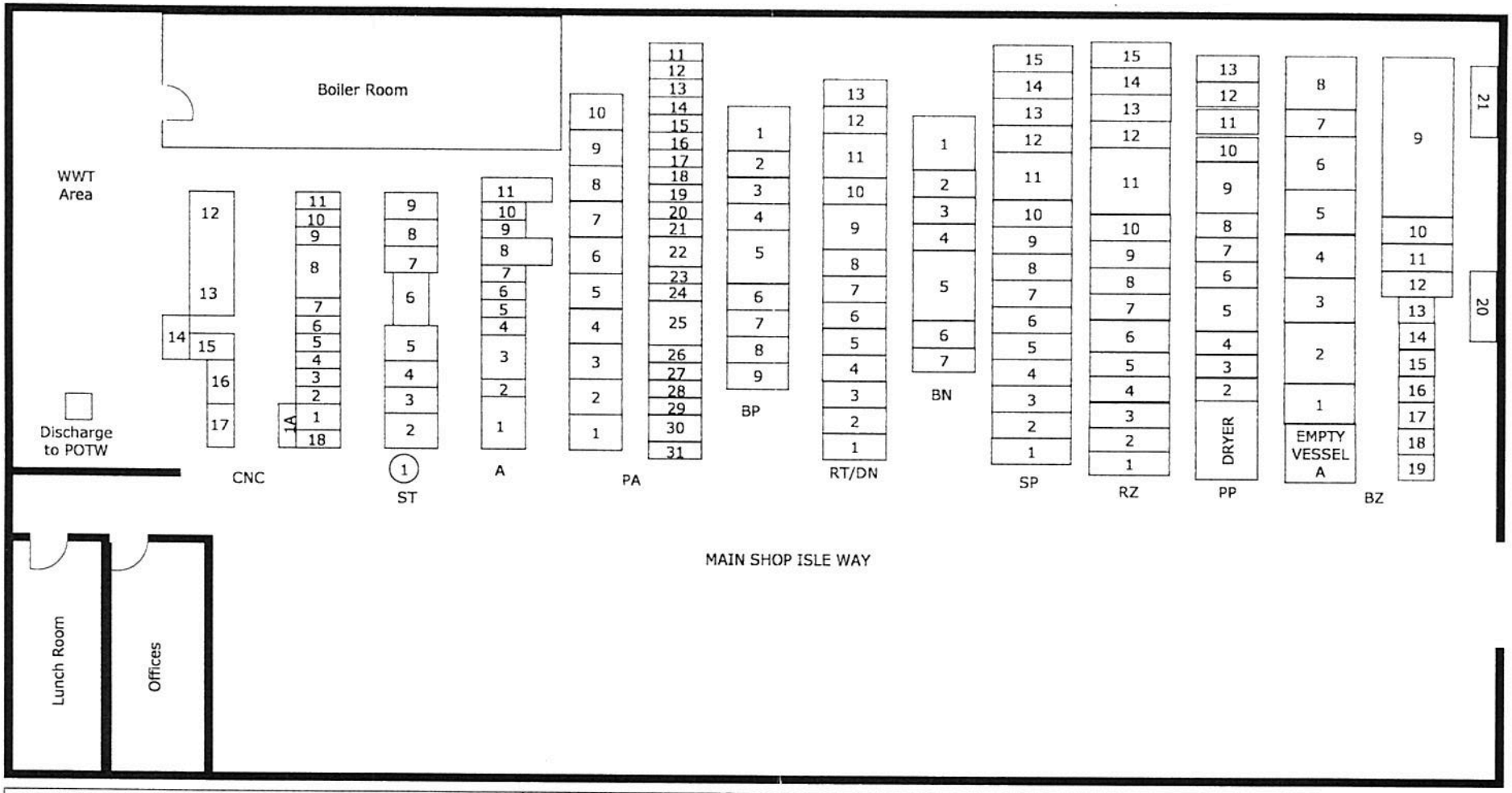
FIGURE 4

Wastewater Treatment Process

Keystone Rustproofing, Inc.
1901 Dr. Thomas Blvd
Arnold, PA 15068
Westmoreland County

ECS&R

3237 US Highway 19
Cochranton, PA 16314



Building 1 – Main Building

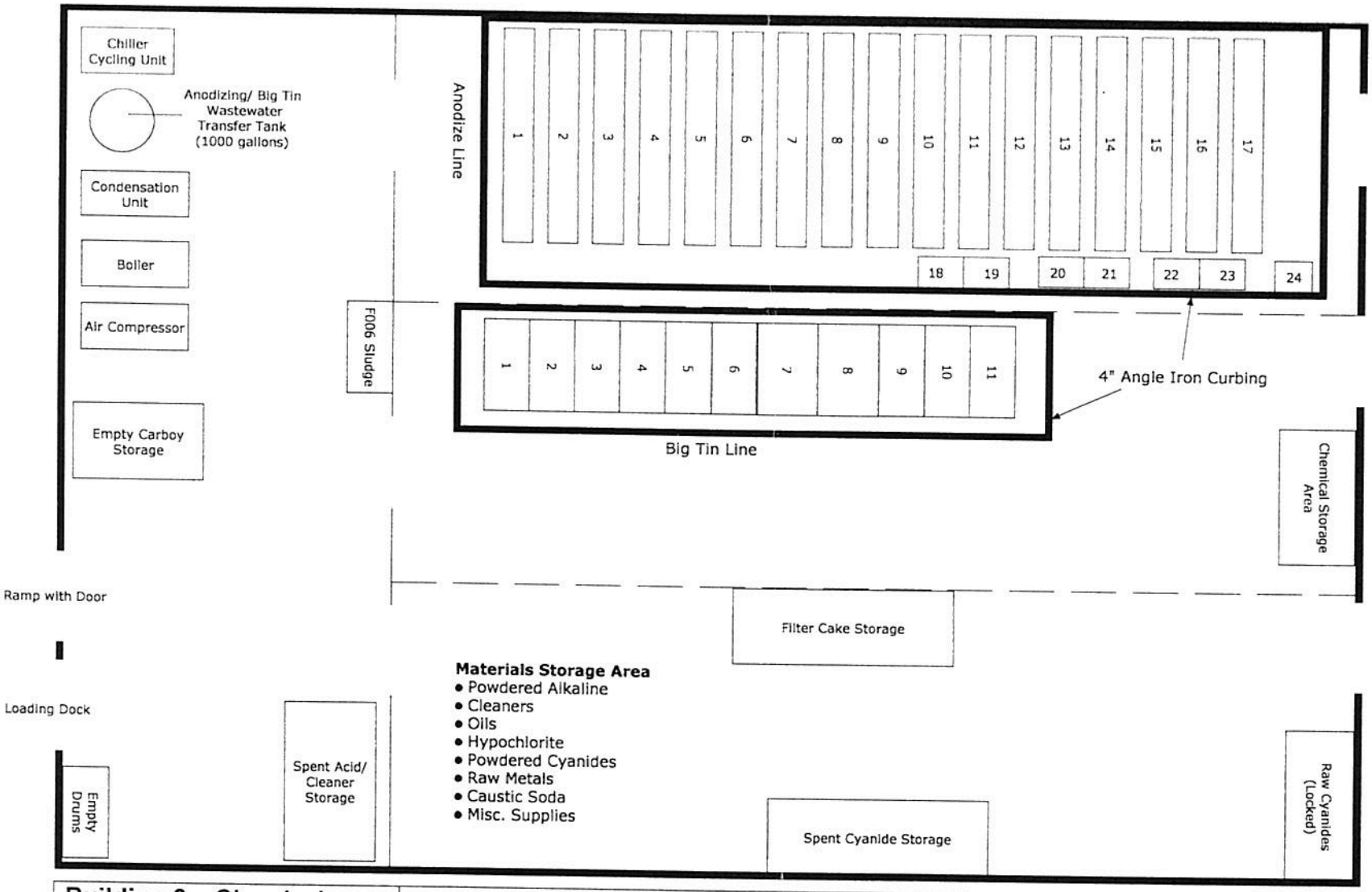
** See Plan for identification of the contents and volume of each tank

N ←

FIGURE 2

Building 1 Layout
Keystone Rustproofing, Inc.
1901 Dr. Thomas Blvd
Arnold, PA 15063
Westmoreland County

ECS&R
3237 US Highway 19
Cochranton, PA 16314
www.ecsr.net



Building 2 – Chemical Storage Building

** See Plan for identification of the contents and volume of each tank

N ←

FIGURE 2

Building 2 Layout
Keystone Rustproofing, Inc.
1901 Dr. Thomas Blvd
Arnold, PA 15063
Westmoreland County

ECSR

3237 US Highway 19
Cochranton, PA 16314
www.ecsr.net

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III
1060 Chapline Street, Suite 303
Wheeling, West Virginia 26003

December 15, 2010

MEMORANDUM

SUBJECT: FAI Report – The Municipal Authority of the City of New Kensington

FROM: William F. Gersting W.F.G. (OECEJ)
Environmental Scientist, Wheeling Office

TO: John Lovell (3WP41)
Pretreatment Coordinator, Office of Municipal Assistance

Attached you will find a copy of the Field Audit Inspection report.

Should you have any questions regarding the attached, please feel free to contact this office at (304) 234-0263.

Attachment(s):

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Form Approved.
OMB No. 2040-0057
Approval expires 8-31-98

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 [N] 2 [5]	3 [PA0027111] 11	12 [101201] 17	18 [T]	19 [R]	20 [1]

Remarks

21 [ ] 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	B1	QA	Reserved
67 [ ] 69	70 [ ]	71 [ ]	72 [ ]	73 [ ] 74 75 [ ] 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

THE MUNICIPAL AUTHORITY OF THE CITY
120 LOGANS FERRY ROAD OF NEW KENSINGTON
NEW KENSINGTON, PA 15068-2046

Entry Time/Date	Permit Effective Date
Exit Time/Date	Permit Expiration Date

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

JOE DITTY/PRETREATMENT COORD.
724/335-9607

Other Facility Data

RECEIVED
EPA REGION III
DEC 22 2010
NPDES PERMITS BRANCH
(3WP41)

Name, Address of Responsible Official/Title/Phone and Fax Number

AS ABOVE

Contacted ☐ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☐ Permit	☐ Flow Measurement	☐ Operations & Maintenance	☐ CSO/SSO (Sewer Overflow)
☐ Records/Reports	☐ Self-Monitoring Program	☐ Sludge Handling/Disposal	☐ Pollution Prevention
☐ Facility Site Review	☐ Compliance Schedules	☐ Pretreatment	☐ Multimedia
☐ Effluent/Receiving Waters	☐ Laboratory	☐ Storm Water	☐ Other:

Section D: Summary of Findings/Comments *(Attach additional sheets of narrative and checklists as necessary)*

SEE ATTACHED

(724) 335-9813
JDITTY@MSANK.ORG

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
William F. Gersting WILLIAM F. GERSTING	EPA/WHEELING/234-0263 304	12/1/10
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date

EPA Form 3560-3 (Rev 9-94) Previous editions are obsolete.

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 94/06/30 = June 30, 1994).

Column 18: Inspection Type. Use one of the codes listed below to describe the type of inspection:

- A Performance Audit
- B Compliance Biomonitoring
- C Compliance Evaluation (non-sampling)
- D Diagnostic
- E Corps of Engineers Inspection
- F Pretreatment Follow-up
- G Pretreatment Audit
- I Industrial User (IU) Inspection
- L Enforcement Case Support
- M Multimedia
- P Pretreatment Compliance Inspection
- R Reconnaissance
- S Compliance Sampling
- U IU Inspection with Pretreatment Audit
- X Toxics Inspection
- Z Sludge
- 2 IU Sampling Inspection
- 3 IU Non-Sampling Inspection
- 4 IU Toxics Inspection
- 5 IU Sampling Inspection with Pretreatment
- 6 IU Non-Sampling Inspection with Pretreatment
- 7 IU Toxics with Pretreatment

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

- C — Contractor or Other Inspectors *(Specify in Remarks columns)*
- E — Corps of Engineers
- J — Joint EPA/State Inspectors—EPA Lead
- N — NEIC Inspectors
- R — EPA Regional Inspector
- S — State Inspector
- T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Multimedia" may indicate medias such as CAA, RCRA, and TSCA. The heading marked "Other" may indicate activities such as SPCC, BMPs, and concerns that are not covered elsewhere.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

Field Audit Inspection

Final Report

The Municipal Authority of the City of New Kensington
120 Logans Ferry Road
New Kensington, PA 15058

Conducted
on
December 1, 2010
by
William F. Gersting

Field Audit Inspection

The Municipal Authority of the City of New Kensington

Summary

This summary is based on responses from Mr. Joseph Ditty, Pretreatment Coordinator for the City of New Kensington to questions on the Field Audit Inspection (FAI) checklist. Since the last inspection, an audit conducted in June 4 - 5, 2008, a few changes have occurred as a result of the audit's required actions.

During this inspection, a sampling event was observed at the Unifirst Corporation's facility located as 1150 Second Avenue in New Kensington. Grab samples were collected for Oil & Grease and pH. The analysis for pH was conducted on-site using a Hach Sension pH meter calibrated against 4, 7, and 10 pH buffers. The sample for Oil & Grease was taken in a swivel-mounted plastic container, and transferred into a glass pre-preserved 1L. bottle. Because Oil & Grease adheres to almost anything with which it comes into contact, the sample should be taken in the bottle that is sent to the lab for analysis. If that is not possible, then the following is recommended. Collect the sample in a smaller glass pre-cleaned bottle and transfer the sample into the pre-preserved 1L. bottle. Send the 1L. AND the smaller bottle to the lab. The lab can then rinse the smaller bottle with the extraction solvent (along with rinsing the 1L. bottle) in order to remove any Oil & Grease that has adhered to the inside of the smaller bottle. All extractions would be combined and the analysis would continue in the routine manner.

Samples were also collected as flow proportioned composites by taking 100 mls of sample for a specific amount of flow past the sampling point by using a Sigma Model 900 sampler tied into an in-line flow meter. The composited sample would be analyzed for $CBOD_5$, TSS, and metals. At the end of the compositing period, an aliquot of sample is transferred into separate (preserved as required) bottles and placed in the POTW's refrigerator awaiting pick up by the contract lab.

POTW PRETREATMENT PROGRAM FIELD AUDIT CHECKLIST

Audit Date	POTW Name
December 1, 2010	The Municipal Authority of the City of New Kensington

Contact Name	Title	Telephone
Joseph Ditty	Pretreatment Coordinator	724/335-9607
Address	120 Logans Ferry Road New Kensington, PA 15068	Lat: N 40° 33.114' Long: W 079° 45.560' Elev: 731'

	Yes	No
Should this be the person on the mailing list?	X	

If no, complete the following for the person to be on the mailing list:

Name	Title	Telephone
N/A		
Address		

Participants

	Name	Title	Organization	Telephone
1	William F. Gersting	Environmental Scientist	U.S.E.P.A.	304/234-0263
2	Garth Connor	Environmental Scientist	U.S.E.P.A.	215/814-3209
3	Joseph Ditty	Pretreatment Coord.	New Kensington	724/335-9607
4				
5				

A. Background - Complete prior to on site activity

1	As required by the approved program, list frequency for:	CIU	SNIU	
	POTW sampling of IUs	2/yr.	2/yr.	
	POTW inspection of IUs	1/yr.	1/yr.	
	IU self-monitoring *Varies depending on IU's W/W flow.	2 – 26/yr.*	2 – 26/yr.*	
	IU reporting	2 – 12/yr.	2 – 12/yr.	
2	In the last year, indicate frequency of:	CIU	SNIU	
	POTW sampling of IUs	2/yr.	2/yr.	
	POTW inspection of IUs	1/yr.	1/yr.	
	If less than required by the approved program or less than 1/yr (403.8(f)(2)(v)), explain	N/A		

3 List all SIUs that were found to have been not sampled or not inspected at the last PCI or annual report

Name of IU	NS/NI/B	Reason
Not applicable.		

4	Does the annual report indicate any new CIUs?	Yes	No	
			X	

B. POTW Sampling and Inspection

1 List the SIUs that were either not sampled or not inspected in the last 12 months (403.8(f)(2)(v)):

Name of IU	NS/NI/B	Date planned/completed
Not applicable.		

2	Are pH, oil & grease, cyanide, volatile organics, total phenol, and sulfide collected by grab sample?	Yes	No	NA
		X		
	If so, how many grab samples are used?	Four (4) over 24 hours.		
3	Are composite samples used for all other pollutants to evaluate compliance with:	Yes	No	NA
	Categorical standards?	X		
	Local limits?	X		
	Is any unannounced sampling conducted?	IU's given 24 hrs. notice.		
4	Is POTW prepared to take samples on short notice (i.e., vehicles, personnel, preservatives, etc. available)?	X		

5	How much time normally elapses between sample collection and obtaining analytical results?		Generally two – three weeks.	
6	Does POTW use QA/QC procedures such as:	Yes	No	NA
	Use of calibration and maintenance plan for sampling equipment? *Mainly maintenance & cleaning.	X*		
	Training for sampler? *O.J.T. & seminars.	X*		
	Split samples (field)? *If requested.	X*		
	Training for analyst?	All samples are sent to a certified (by PA) laboratory for analysis. The POTW performs the pH analysis on site. The field pH meter is calibrated against three buffers.		
	Duplicate samples (laboratory)?			
	Method blanks (laboratory)?			
	Spiked samples (laboratory)?			

C. IU Self-Monitoring and Reporting

1	As currently conducted, list frequency for:	CIU	SNIU	
	IU self-monitoring *Limited to pH, BOD, TSS and O. & G.	6/yr.	4 – 52*/yr.	
	IU reporting	6/yr.	4 – 12/yr.	
	If less than required by the approved program, explain	N/A		
2	If IUs sample more frequently than required, do they report all sampling results to the POTW (403.12(g)(5))?	Yes	No	NA
		X		
3	List all new source IUs	Keystone Rustproofing.		
	Have the following been received by all IUs which became new sources in the last 12 months (403.12))?	# received	# required	
	Baseline Monitoring Reports	N/A	N/A	
	Compliance Schedule Milestone Reports	N/A	N/A	
	90-day Final Compliance Reports	N/A	N/A	
	How does POTW verify the information in these reports?	N/A		
4	Do any IUs discharge hazardous waste?	Yes	No	
			X	
	If no, how does POTW verify this?	Inspections, testing, written cert.		
	If yes, has the IU submitted the proper notifications (403.12(p))?	Yes	No	NA
				X

INDUSTRIAL USER FILE EVALUATION			
IU Name	Unifirst Corporation		
Category	SNIU	PWF	100 K – 120 K gpd
Reg. Params.	pH, Oil & Grease, TSS As, Cd, Cr, Cr^{+6} Cu, Pb, Hg, Ni,		
Address	1150 Second Avenue		
Comments	This IU is a commercial laundry (no dry cleaning). IU rents/cleans uniforms.		
IU Name			
Category		PWF	
Reg. Params.			
Address			
Comments			
IU Name			
Category		PWF	
Reg. Params.			
Address			
Comments			
IU Name			
Category		PWF	
Reg. Params.			
Address			
Comments			

NOTE: Complete all questions with a "Y" (yes), "N" (no), "N/A" (not applicable), "U" (unable to determine), or the appropriate number.

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
A. Industrial User Characterization				
1. Is the IU categorical (CIU), significant non-categorical (SNIU) or other (O)?	SNIU			
2. Is the IU properly categorized?	Y			
B. Control Mechanism				
1. Does the file contain:				
• an updated control mechanism application and/or survey questionnaire?	June, 2010			
• a current control mechanism?	Y			
• documentation of how control mechanism limits and requirements were established? *Not clearly addressed.	N*			
2. Were local limits and/or categorical standards properly applied?	Y			
3. If applicable, were production-based standards correctly applied?	N/A			
4. If applicable, was the combined wastestream formula correctly applied?	N/A			
5. If applicable, were TTO requirements or alternatives correctly applied?	N/A			
6. In the inspector's opinion, is the sample frequency sufficient to determine compliance?	Y			
7. Does the control mechanism include:				
• sampling location and frequency?	Y/Y			
• sample type?	Y			
8. Is the permit effective for 5 years or less?	Y			
C. POTW Inspections of IUs				
1. How many POTW inspections were conducted and documented in the last 12 months?	1			
2. Does the inspection report include:				
• inspector name?	Y			
• inspection date/time?	Y/Y			
• name of IU official contacted?	Y			

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
• review of manufacturing facilities?	Y			
• verification of production data if needed?	N/A			
• identification of wastewater sources, flow and types of discharge?	Y			
• condition of pretreatment facilities?	Y			
• evaluation of chemical storage areas?	Y			
• evaluation of need for spill/slug control plan at least every 2 years?	Y			
• evaluation of spill/slug control procedures?	Y			
• evaluation of housekeeping practices?	Y			
• evaluation of potential for hazardous waste discharge?	Y			
• evaluation of self-monitoring equipment and techniques?	Y			
• evaluation of lab procedures?	N			
• evaluation of monitoring records?	Y			
D. POTW Sampling of IUs				
1. How many sampling visits were conducted and documented in the last 12 months?	2			
2. Does the sampling documentation include:				
• name of sampling personnel?	Y			
• sample date/time?	Y/Y			
• sample type?	Y			
• sample location?	Y			
• wastewater flow during sampling? *Recorded in log book.	Y*			
• sample preservation?	Y			
• chain of custody?	Y			
• analytical methods used?	Y			
• analysis date?	Y			
• name of analyst?	Y			
• all analytical data?	Y			
3. Were all regulated parameters monitored?	Y			
4. Were 40 CFR 136 analytical methods used?	Y			

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
E. IU Self-Monitoring and Reporting				
1. Has the IU submitted all required self-monitoring reports in the last 12 months?	Y			
2. Were all regulated parameters monitored at the required frequency?	Y			
F. Slug/Spill Control				
1. Have any slugs/spills been documented in the file?	N			
2. Did the POTW require development of a slug/spill control plan?	Y			
3. Has the IU developed a slug/spill control plan?	Y			
4. Does the slug/spill plan contain:				
• description of discharge practices? *Not specifically addressed.	N*			
• description of stored chemicals?	Y			
• procedures to prevent slugs/spills?	Y			
• procedures to notify POTW of slugs/spills?	Y			
• follow-up practices to minimize damage from slugs/spills?	Y			